



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: August 1, 2014

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

Source Name: Mitchell Plastics

Permit Level: Significant Revision

Permit Number: 019-34555-00103

Source Location: 301 Pike Street, Charlestown, Indiana

Type of Action Taken: Modification at an existing source
Revisions to permit requirements
Changes that are administrative in nature

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 34555.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

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

(continues on next page)

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

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

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

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

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



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Commissioner

Ms. Pami Egan
Mitchell Plastics
301 Pike Street
Charlestown, Indiana 47111

August 1, 2014

Re: 019-34555-00103
Significant Revision to
F019-30695-00103

Dear Ms. Egan:

Mitchell Plastics was issued a Federally Enforceable State Operating Permit (FESOP) No. F019-30695-00103 on December 19, 2011, for a stationary plastic injection molding facility located at 301 Pike Street, Charlestown, Indiana 47111. On May 21, 2014, the Office of Air Quality (OAQ) received an application from the source requesting to replace the current spray booth, identified as SB-2, with a new, more efficient spray booth. Injection Molding Unit 2516 has been removed from the facility. Injection Molding Units 305T, 450T, and 860T are being added to the facility. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
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.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), 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.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised.

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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

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 Brandon Miller of my staff at 317-234-5373 or 1-800-451-6027, and ask for extension 4-5373.

Sincerely,



Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

IC/bdm

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



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Michael R. Pence
 Governor

Thomas W. Easterly
 Commissioner

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

**Mitchell Plastics
 301 Pike Street
 Charlestown, Indiana 47111**

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

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

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

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

Operation Permit No.: F019-30695-00103	
Issued by: <i>Original Signed by:</i> Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 19, 2011 Expiration Date: December 19, 2016
Administrative Amendment No.: 019-31519-00103, issued April 4, 2012 Administrative Amendment No.: 019-32401-00103, issued November 28, 2012 Administrative Amendment No.: 019-32801-00103, issued February 25, 2013 Administrative Amendment No.: 019-33010-00103, issued April 11, 2013	
Administrative Amendment No.: 019-34555-00103	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 1, 2014 Expiration Date: December 19, 2016

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary plastic injection molded parts and surface coating source.

Source Address:	301 Pike Street, Charlestown, Indiana 47111
General Source Phone Number:	(812) 256-3351
SIC Code:	3089 (Plastic Products, Not Elsewhere Classified)
County Location:	Clark
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) spray booth, identified as SB-1, installed in November 2000, equipped with one (1) manual or robotic HVLP spray gun or an equivalent spray method with higher transfer efficiency, for plastic parts surface coating, with a maximum capacity of 240 units per hour, using water baffles for overspray control, with a flash off area (FO-1), and exhausting to two (2) stacks SPK-1, and SSB-1.
- (b) One (1) spray booth, identified as SB-2, installed in November 2000, approved in 2014 for construction, equipped with two (2) manual or robotic HVLP spray gun or an equivalent spray method with higher transfer efficiency, for plastic parts surface coating, with a maximum capacity of 636 units per hour, using water baffles for overspray control, with a flash off area (FO-2), and exhausting to two (2) stacks SPK-2, and SSB-2.

This spray booth replaces an existing spray booth that was installed in November 2000.
- (c) One (1) spray booth, identified as SB-3, installed in November 2001, for painting plastic parts, with a maximum capacity of 240 units per hour, equipped with one (1) HVLP spray gun or an equivalent spray method with higher transfer efficiency, using a dry filter for overspray control, with a flash off area (FO-3), and exhausting to two (2) stacks SPK-3 and SSB-3.
- (d) One (1) spray booth, identified as SB-4, installed in 2011, for painting plastic parts, with a maximum capacity of 240 units per hour, equipped with three (3) HVLP spray guns or an equivalent spray method with higher transfer efficiency, using both a wet booth and dry filters as control, with a flash off area (FO-4), and exhausting to stack SSB-4.
- (e) One (1) natural gas-fired curing oven, identified as CO-1, installed in November 2000, rated at 1.0 million British thermal units (MMBtu) per hour, and exhausting to stack SCO-1.

- (f) One (1) natural gas-fired curing oven, identified as CO-2, installed in November 2000, rated at 1.0 million British thermal units (MMBtu) per hour, and exhausting to stack SCO-2.
- (g) One (1) natural gas-fired curing oven, identified as CO-3, installed in November 2001, rated at 0.75 million British thermal units (MMBtu) per hour, used to cure the paint from SB-3, and exhausting to stack SCO-3.
- (h) Forty-nine (49) closed injection molding machines, no control, and all exhausting to the inside of the building including the following:
 - (1) One (1) 40-Ton Injection Molding Machine, identified as D.A. #562, with a maximum throughput rate of 9.76 pounds of resin per hour.
 - (2) One (1) 40-Ton Injection Molding Machine, identified as D.A. #959, with a maximum throughput rate of 8.77 pounds of resin per hour.
 - (3) One (1) 40-Ton Injection Molding Machine, identified as D.A. #561, with a maximum throughput rate of 1.98 pounds of resin per hour.
 - (4) One (1) 40-Ton Injection Molding Machine, identified as D.A. #1151, with a maximum throughput rate of 4.44 pounds of resin per hour.
 - (5) One (1) 40-Ton Injection Molding Machine, identified as D.A. #563, with a maximum throughput rate of 13.73 pounds of resin per hour.
 - (6) One (1) 50-Ton Injection Molding Machine, identified as D.A. #2277, approved in 2011 for construction, with a maximum throughput rate of 115.0 pounds of resin per hour.
 - (7) One (1) 55-Ton Injection Molding Machine, identified as D.A. #2245, with a maximum throughput rate of 3.74 pounds of resin per hour.
 - (8) One (1) 75-Ton Injection Molding Machine, identified as D.A. #578, with a maximum throughput rate of 9.23 pounds of resin per hour.
 - (9) One (1) 75-Ton Injection Molding Machine, identified as D.A. #2006, with a maximum throughput rate of 10.89 pounds of resin per hour.
 - (10) One (1) 75-Ton Injection Molding Machine, identified as D.A. #576, with a maximum throughput rate of 13.58 pounds of resin per hour.
 - (11) One (1) 80-Ton Injection Molding Machine, One (1) identified as D.A. #1007, with a maximum throughput rate of 5.45 pounds of resin per hour.
 - (12) One (1) 85-Ton Injection Molding Machine, identified as D.A. #2242, with a maximum throughput rate of 4.05 pounds of resin per hour.
 - (13) One (1) 85-Ton Injection Molding Machine, identified as D.A. #2244, approved in 2011 for construction, with a maximum throughput rate of 59.4 pounds of resin per hour.
 - (14) One (1) 90-Ton Injection Molding Machine, identified as D.A. #288, with a maximum throughput rate of 29.85 pounds of resin per hour.
 - (15) One (1) 100-Ton Injection Molding Machine, identified as D.A. #573, with a maximum throughput rate of 11.87 pounds of resin per hour.
 - (16) One (1) 100-Ton Injection Molding Machine, identified as D.A. #962, with a maximum

throughput rate of 16.16 pounds of resin per hour.

- (17) One (1) 100-Ton Injection Molding Machine identified as D.A. #1029, with a maximum throughput rate of 24.09 pounds of resin per hour.
- (18) One (1) 100-Ton Injection Molding Machine, identified as D.A. #1030, with a maximum throughput rate of 21.96 pounds of resin per hour.
- (19) One (1) 100-Ton Injection Molding Machine, identified as D.A. #1200, with a maximum throughput rate of 17.09 pounds of resin per hour.
- (20) One (1) 100-Ton Injection Molding Machine, identified as D.A. #2511, with a maximum throughput rate of 4.9 pounds of resin per hour, approved for construction in 2012.
- (21) One (1) 100-Ton Injection Molding Machine, identified as D.A. #2512, with a maximum throughput rate of 25 pounds of resin per hour, approved for construction in 2012.
- (22) One (1) 160-Ton Injection Molding Machine, identified as D.A. #572, with a maximum throughput rate of 24.51 pounds of resin per hour.
- (23) One (1) 160-Ton Injection Molding Machine, identified as D.A. #570, with a maximum throughput rate of 14.27 pounds of resin per hour.
- (24) One (1) 180-Ton Injection Molding Machine, identified as D.A. #305T, with a maximum throughput rate of 182 pounds of resin per hour, approved in 2014 for construction.
- (25) One (1) 180-Ton Injection Molding Machine, identified as D.A. #450T, with a maximum throughput rate of 150 pounds of resin per hour, approved in 2014 for construction.
- (26) One (1) 180-Ton Injection Molding Machine, identified as D.A. #860T, with a maximum throughput rate of 60 pounds of resin per hour, approved in 2014 for construction.
- (27) One (1) 180-Ton Injection Molding Machine, identified as D.A. #2517, with a maximum throughput rate of 88 pounds of resin per hour, approved for construction in 2012.
- (28) One (1) 200-Ton Injection Molding Machine, identified as D.A. #272, with a maximum throughput rate of 17.65 pounds of resin per hour.
- (29) One (1) 220-Ton Injection Molding Machine, identified as D.A. #1196, with a maximum throughput rate of 20.96 pounds of resin per hour.
- (30) One (1) 220-Ton Injection Molding Machine, identified as D.A. #1195, with a maximum throughput rate of 27.21 pounds of resin per hour.
- (31) One (1) 280-Ton Injection Molding Machine, identified as D.A. #569, with a maximum throughput rate of 29.29 pounds of resin per hour.
- (32) One (1) 280-Ton Injection Molding Machine, identified as D.A. #2518, with a maximum throughput rate of 16.5 pounds of resin per hour, approved for construction in 2012.
- (33) One (1) 350-Ton Injection Molding Machine, identified as D.A. #2278, approved in 2011 for construction, with a maximum throughput rate of 115.0 pounds of resin per hour.
- (34) One (1) 350-Ton Injection Molding Machine, identified as D.A. #568, with a maximum throughput rate of 25.80 pounds of resin per hour.

- (35) One (1) 350-Ton Injection Molding Machine, identified as D.A. #565, with a maximum throughput rate of 106.23 pounds of resin per hour.
- (36) One (1) 350-Ton Injection Molding Machine, identified as D.A. #368, with a maximum throughput rate of 20.72 pounds of resin per hour.
- (37) One (1) 350-Ton Injection Molding Machine, identified as D.A. #567, with a maximum throughput rate of 8.04 pounds of resin per hour.
- (38) One (1) 350-Ton Injection Molding Machine, identified as D.A. #566, with a maximum throughput rate of 14.90 pounds of resin per hour.
- (39) One (1) 350-Ton Injection Molding Machine, identified as D.A. #564, with a maximum throughput rate of 14.90 pounds of resin per hour.
- (40) One (1) 350-Ton Injection Molding Machine, identified as D.A. #1013, with a maximum throughput rate of 61.22 pounds of resin per hour.
- (41) One (1) 350-Ton Injection Molding Machine, identified as D.A. #2035, transfer machine, with a maximum throughput rate of 115.0 pounds of resin per hour.
- (42) One (1) 350-Ton Injection Molding Machine, identified as D.A. # 2513, with a maximum throughput rate of 116 pounds of resin per hour, approved for construction in 2012.
- (43) One (1) 350-Ton Injection Molding Machine, identified as D.A. # 2514, with a maximum throughput rate of 116 pounds of resin per hour, approved for construction in 2012.
- (44) One (1) 350-Ton Injection Molding Machine, identified as D.A. # 2515, with a maximum throughput rate of 116 pounds of resin per hour, approved for construction in 2012.
- (45) One (1) 390-Ton Injection Molding Machine, identified as D.A. #2099, with a maximum throughput rate of 12.49 pounds of resin per hour.
- (46) One (1) 450-Ton Injection Molding Machine, identified as D.A. #1372, with a maximum throughput rate of 56.80 pounds of resin per hour.
- (47) One (1) 450-Ton Injection Molding Machine, identified as D.A. #2282, with a maximum throughput rate of 59.56 pounds of resin per hour.
- (48) One (1) 550-Ton Injection Molding Machine, identified as D.A. #668, with a maximum throughput rate of 41.50 pounds of resin per hour.
- (49) One 55-Ton Injection Molding Machine, identified as D.A. #2348, with a maximum throughput rate of 77.19 pounds of resin per hour.

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

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour as follows:

- (1) Two (2) Omega Radiant Heaters, identified as RH1 and RH2, both installed in January 2007, each with a maximum heat input capacity of 0.40 MMBtu/hr, and all exhausting indoors.
 - (2) One (1) natural gas-fired Lennox Model 30 A Heater, identified as L1, installed in March 2000, with a maximum heat input capacity of 0.24 MMBtu/hr, and exhausting indoors.
 - (3) Four (4) natural gas-fired Air Rotation Units, identified as AR1 through AR4, all installed in March 2000, each with a maximum heat input capacity of 1.25 MMBtu/hr, and all exhausting indoors.
- (b) Paved roads and paved parking lots with public access. [326 IAC 6-4]

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F019-30695-00103, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

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

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Southwest Regional Office and Southeast Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)

Facsimile Number: 317-233-6865

Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304

Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

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

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

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

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

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

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

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

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

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

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

- (a) All terms and conditions of permits established prior to F019-30695-00103 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Overall Source Limit [326 IAC 2-8]

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

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
 - (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.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).

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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

C.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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.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 2-8-4][326 IAC 2-8-5(a)(1)]

C.9 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

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

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

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

C.11 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.12 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual

manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

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

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

C.14 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

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

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

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

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

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

C.15 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

Stratospheric Ozone Protection

C.16 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) spray booth, identified as SB-1, installed in November 2000, equipped with one (1) manual or robotic HVLP spray gun or an equivalent spray method with higher transfer efficiency, for plastic parts surface coating, with a maximum capacity of 240 units per hour, using water baffles for overspray control, with a flash off area (FO-1), and exhausting to two (2) stacks SPK-1, and SSB-1.

(b) One (1) spray booth, identified as SB-2, installed in November 2000, approved in 2014 for construction, equipped with two (2) manual or robotic HVLP spray gun or an equivalent spray method with higher transfer efficiency, for plastic parts surface coating, with a maximum capacity of 636 units per hour, using water baffles for overspray control, with a flash off area (FO-2), and exhausting to two (2) stacks SPK-2, and SSB-2.

This spray booth replaces an existing spray booth that was installed in November 2000.

(c) One (1) spray booth, identified as SB-3, installed in November 2001, for painting plastic parts, with a maximum capacity of 240 units per hour, equipped with one (1) HVLP spray gun or an equivalent spray method with higher transfer efficiency, using a dry filter for overspray control, with a flash off area (FO-3), and exhausting to two (2) stacks SPK-3 and SSB-3.

(d) One (1) spray booth, identified as SB-4, installed in 2011 for painting plastic parts, with a maximum capacity of 240 units per hour, equipped with three (3) HVLP spray guns or an equivalent spray method with higher transfer efficiency, using both a wet booth and dry filters as control, with a flash off area (FO-4), and exhausting to stack SSB-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 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 not applicable, the Permittee shall comply with the following:

The VOC input (including dilution and cleaning solvents) to spray booths SB-1, SB-2, SB-3 and SB-4 combined shall be less than 98.71 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC from the entire source to less than 100 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-7 not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 not applicable, the Permittee shall comply with the following:

- (1) The volatile organic compounds (VOC) input (including dilution and cleaning solvents) to the spray booth, identified as SB-1, shall be less than twenty-five (25) tons per year per twelve (12) consecutive month period each, with compliance determined at the end of each month.

- (2) The volatile organic compounds (VOC) input (including dilution and cleaning solvents) to the spray booth, identified as SB-2, shall be less than twenty-five (25) tons per year per twelve (12) consecutive month period each, with compliance determined at the end of each month.
- (3) The volatile organic compounds (VOC) input (including dilution and cleaning solvents) to the spray booth, identified as SB-3, shall be less than twenty-five (25) tons per year per twelve (12) consecutive month period each, with compliance determined at the end of each month.
- (4) The volatile organic compounds (VOC) input (including dilution and cleaning solvents) to the spray booth, identified as SB-4, shall be less than twenty-five (25) tons per year per twelve (12) consecutive month period each, with compliance determined at the end of each month.

Compliance with the above limits shall limit the potential to emit VOC from the spray booths SB-1, SB-2, SB-3, and SB-4, each to less than twenty-five (25) tons per 12 consecutive month period and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(h), surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the source shall operate the control device in accordance with manufacturer's specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)][326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 Particulate Control

- (1) In order to comply with Condition D.1.3, the water baffles for overspray control shall be in operation and control emissions from the spray booth, identified as SB-1, at all times that the spray booth, identified as SB-1, is in operation.
- (2) In order to comply with Condition D.1.3, the water baffles for overspray control shall be in operation and control emissions from the spray booth, identified as SB-2, at all times that the spray booth, identified as SB-2, is in operation.
- (3) In order to comply with Condition D.1.3, the dry filter for overspray control shall be in operation and control emissions from the spray booth, identified as SB-3, at all times that the spray booth, identified as SB-3, is in operation.
- (4) In order to comply with Condition D.1.3, the wet booth and dry filters for control shall be in operation and control emissions from the spray booth, identified as SB-4, at all times that

the spray booth, identified as SB-4 is in operation.

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

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry particulate filters controlling each of the spray booths SB-3 and SB-4. To monitor the performance of the dry filters, water baffles and wet booth weekly observations shall be made of the overspray from each of the spray booths stacks SPK-1, SSB-1, SPK-2, SSB-2, SPK-3, SSB-3, SPK-4 and SSB-4 while one or more of the spray booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.8 Record Keeping Requirement

- (a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document the compliance status with Conditions D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.9 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (h) Forty-nine (49) closed injection molding machines, no control, and all exhausting to the inside of the building including the following:
- (1) One (1) 40-Ton Injection Molding Machine, identified as D.A. #562, with a maximum throughput rate of 9.76 pounds of resin per hour.
 - (2) One (1) 40-Ton Injection Molding Machine, identified as D.A. #959, with a maximum throughput rate of 8.77 pounds of resin per hour.
 - (3) One (1) 40-Ton Injection Molding Machine, identified as D.A. #561, with a maximum throughput rate of 1.98 pounds of resin per hour.
 - (4) One (1) 40-Ton Injection Molding Machine, identified as D.A. #1151, with a maximum throughput rate of 4.44 pounds of resin per hour.
 - (5) One (1) 40-Ton Injection Molding Machine, identified as D.A. #563, with a maximum throughput rate of 13.73 pounds of resin per hour.
 - (6) One (1) 50-Ton Injection Molding Machine, identified as D.A. #2277, approved in 2011 for construction, with a maximum throughput rate of 115.0 pounds of resin per hour.
 - (7) One (1) 55-Ton Injection Molding Machine, identified as D.A. #2245, with a maximum throughput rate of 3.74 pounds of resin per hour.
 - (8) One (1) 75-Ton Injection Molding Machine, identified as D.A. #578, with a maximum throughput rate of 9.23 pounds of resin per hour.
 - (9) One (1) 75-Ton Injection Molding Machine, identified as D.A. #2006, with a maximum throughput rate of 10.89 pounds of resin per hour.
 - (10) One (1) 75-Ton Injection Molding Machine, identified as D.A. #576, with a maximum throughput rate of 13.58 pounds of resin per hour.
 - (11) One (1) 80-Ton Injection Molding Machine, One (1) identified as D.A. #1007, with a maximum throughput rate of 5.45 pounds of resin per hour.
 - (12) One (1) 85-Ton Injection Molding Machine, identified as D.A. #2242, with a maximum throughput rate of 4.05 pounds of resin per hour.
 - (13) One (1) 85-Ton Injection Molding Machine, identified as D.A. #2244, approved in 2011 for construction, with a maximum throughput rate of 59.4 pounds of resin per hour.
 - (14) One (1) 90-Ton Injection Molding Machine, identified as D.A. #288, with a maximum throughput rate of 29.85 pounds of resin per hour.
 - (15) One (1) 100-Ton Injection Molding Machine, identified as D.A. #573, with a maximum throughput rate of 11.87 pounds of resin per hour.
 - (16) One (1) 100-Ton Injection Molding Machine, identified as D.A. #962, with a maximum

throughput rate of 16.16 pounds of resin per hour.

- (17) One (1) 100-Ton Injection Molding Machine identified as D.A. #1029, with a maximum throughput rate of 24.09 pounds of resin per hour.
- (18) One (1) 100-Ton Injection Molding Machine, identified as D.A. #1030, with a maximum throughput rate of 21.96 pounds of resin per hour.
- (19) One (1) 100-Ton Injection Molding Machine, identified as D.A. #1200, with a maximum throughput rate of 17.09 pounds of resin per hour.
- (20) One (1) 100-Ton Injection Molding Machine, identified as D.A. #2511, with a maximum throughput rate of 4.9 pounds of resin per hour, approved for construction in 2012.
- (21) One (1) 100-Ton Injection Molding Machine, identified as D.A. #2512, with a maximum throughput rate of 25 pounds of resin per hour, approved for construction in 2012.
- (22) One (1) 160-Ton Injection Molding Machine, identified as D.A. #572, with a maximum throughput rate of 24.51 pounds of resin per hour.
- (23) One (1) 160-Ton Injection Molding Machine, identified as D.A. #570, with a maximum throughput rate of 14.27 pounds of resin per hour.
- (24) One (1) 180-Ton Injection Molding Machine, identified as D.A. #305T, with a maximum throughput rate of 182 pounds of resin per hour, approved in 2014 for construction.
- (25) One (1) 180-Ton Injection Molding Machine, identified as D.A. #450T, with a maximum throughput rate of 150 pounds of resin per hour, approved in 2014 for construction.
- (26) One (1) 180-Ton Injection Molding Machine, identified as D.A. #860T, with a maximum throughput rate of 60 pounds of resin per hour, approved in 2014 for construction.
- (27) One (1) 180-Ton Injection Molding Machine, identified as D.A. #2517, with a maximum throughput rate of 88 pounds of resin per hour, approved for construction in 2012.
- (28) One (1) 200-Ton Injection Molding Machine, identified as D.A. #272, with a maximum throughput rate of 17.65 pounds of resin per hour.
- (29) One (1) 220-Ton Injection Molding Machine, identified as D.A. #1196, with a maximum throughput rate of 20.96 pounds of resin per hour.
- (30) One (1) 220-Ton Injection Molding Machine, identified as D.A. #1195, with a maximum throughput rate of 27.21 pounds of resin per hour.
- (31) One (1) 280-Ton Injection Molding Machine, identified as D.A. #569, with a maximum throughput rate of 29.29 pounds of resin per hour.
- (32) One (1) 280-Ton Injection Molding Machine, identified as D.A. #2518, with a maximum throughput rate of 16.5 pounds of resin per hour, approved for construction in 2012.
- (33) One (1) 350-Ton Injection Molding Machine, identified as D.A. #2278, approved in 2011 for construction, with a maximum throughput rate of 115.0 pounds of resin per hour.
- (34) One (1) 350-Ton Injection Molding Machine, identified as D.A. #568, with a maximum

throughput rate of 25.80 pounds of resin per hour.

- (35) One (1) 350-Ton Injection Molding Machine, identified as D.A. #565, with a maximum throughput rate of 106.23 pounds of resin per hour.
- (36) One (1) 350-Ton Injection Molding Machine, identified as D.A. #368, with a maximum throughput rate of 20.72 pounds of resin per hour.
- (37) One (1) 350-Ton Injection Molding Machine, identified as D.A. #567, with a maximum throughput rate of 8.04 pounds of resin per hour.
- (38) One (1) 350-Ton Injection Molding Machine, identified as D.A. #566, with a maximum throughput rate of 14.90 pounds of resin per hour.
- (39) One (1) 350-Ton Injection Molding Machine, identified as D.A. #564, with a maximum throughput rate of 14.90 pounds of resin per hour.
- (40) One (1) 350-Ton Injection Molding Machine, identified as D.A. #1013, with a maximum throughput rate of 61.22 pounds of resin per hour.
- (41) One (1) 350-Ton Injection Molding Machine, identified as D.A. #2035, transfer machine, with a maximum throughput rate of 115.0 pounds of resin per hour.
- (42) One (1) 350-Ton Injection Molding Machine, identified as D.A. # 2513, with a maximum throughput rate of 116 pounds of resin per hour, approved for construction in 2012.
- (43) One (1) 350-Ton Injection Molding Machine, identified as D.A. # 2514, with a maximum throughput rate of 116 pounds of resin per hour, approved for construction in 2012.
- (44) One (1) 350-Ton Injection Molding Machine, identified as D.A. # 2515, with a maximum throughput rate of 116 pounds of resin per hour, approved for construction in 2012.
- (45) One (1) 390-Ton Injection Molding Machine, identified as D.A. #2099, with a maximum throughput rate of 12.49 pounds of resin per hour.
- (46) One (1) 450-Ton Injection Molding Machine, identified as D.A. #1372, with a maximum throughput rate of 56.80 pounds of resin per hour.
- (47) One (1) 450-Ton Injection Molding Machine, identified as D.A. #2282, with a maximum throughput rate of 59.56 pounds of resin per hour.
- (48) One (1) 550-Ton Injection Molding Machine, identified as D.A. #668, with a maximum throughput rate of 41.50 pounds of resin per hour.
- (49) One 55-Ton Injection Molding Machine, identified as D.A. #2348, with a maximum throughput rate of 77.19 pounds of resin per hour.

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

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

D.2.1 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from the Injection Molding Machines shall each not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

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

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

Source Name: Mitchell Plastics
Source Address: 301 Pike Street, Charlestown, Indiana 47111
FESOP Permit No.: F019-30695-00103

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Mitchell Plastics
Source Address: 301 Pike Street, Charlestown, Indiana 47111
FESOP Permit No.: F019-30695-00103

This form consists of 2 pages

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Mitchell Plastics
Source Address: 301 Pike Street, Charlestown, Indiana 47111
FESOP Permit No.: F019-30695-00103
Facility: Spray Booth SB-1
Parameter: Volatile organic compounds (VOC) input
Limit: shall be less than twenty-five (25) tons per year per twelve (12) consecutive month period each, with compliance determined at the end of each month.

Quarter: _____ YEAR: _____

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

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

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

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

FESOP Quarterly Report

Source Name: Mitchell Plastics
Source Address: 301 Pike Street, Charlestown, Indiana 47111
FESOP Permit No.: F019-30695-00103
Facility: Spray Booth SB-2
Parameter: Volatile organic compounds (VOC) input
Limit: shall be less than twenty-five (25) tons per year per twelve (12) consecutive month period each, with compliance determined at the end of each month.

Quarter: _____ YEAR: _____

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

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

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

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

FESOP Quarterly Report

Source Name: Mitchell Plastics
Source Address: 301 Pike Street, Charlestown, Indiana 47111
FESOP Permit No.: F019-30695-00103
Facility: Spray Booth SB-3
Parameter: Volatile organic compounds (VOC) input
Limit: Shall be less than twenty-five (25) tons per year per twelve (12) consecutive month period each, with compliance determined at the end of each month.

Quarter: _____ YEAR: _____

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

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

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

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

FESOP Quarterly Report

Source Name: Mitchell Plastics
Source Address: 301 Pike Street, Charlestown, Indiana 47111
FESOP Permit No.: F019-30695-00103
Facility: Spray Booth SB-4
Parameter: Volatile organic compounds (VOC) input
Limit: Shall be less than twenty-five (25) tons per year per twelve (12) consecutive month period each, with compliance determined at the end of each month.

Quarter: _____ YEAR: _____

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

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

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

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

FESOP Quarterly Report

Source Name: Mitchell Plastics
Source Address: 301 Pike Street, Charlestown, Indiana 47111
FESOP Permit No.: F019-30695-00103
Facility: Spray Booths SB-1, SB-2, SB-3 and SB-4
Parameter: Volatile organic compounds (VOC) input
Limit: Combined shall be less than 98.71 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Quarter: _____ YEAR: _____

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

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

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

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

Source Name: Mitchell Plastics
Source Address: 301 Pike Street, Charlestown, Indiana 47111
FESOP Permit No.: F019-30695-00103

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Technical Support Document (TSD) for a Significant Permit Revision to a
Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name:	Mitchell Plastics
Source Location:	301 Pike Street, Charlestown, Indiana 47111
County:	Clark (Charlestown Township)
SIC Code:	3089 (Plastic Products, Not Elsewhere Classified)
Operation Permit No.:	F019-30695-00103
Operation Permit Issuance Date:	December 19, 2011
Significant Permit Revision No.:	019-34555-00103
Permit Reviewer:	Brandon Miller

On May 21, 2014, the Office of Air Quality (OAQ) received an application from Mitchell Plastics related to a modification to an existing stationary plastic injection molded parts and surface coating operation.

Existing Approvals

The source was issued FESOP No. 019-30695-00103 on December 19, 2011. The source has since received the following approvals:

- (a) Administrative Amendment No. 019-31519-00103, issued on April 4, 2012;
- (b) Administrative Amendment No. 019-32401-00103, issued on November 28, 2012;
- (c) Administrative Amendment No. 019-32801-00103, issued on February 25, 2013; and
- (d) Administrative Amendment No. 019-33010-00103, issued on April 11, 2013.

County Attainment Status

The source is located in Clark 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}	Basic nonattainment designation effective federally April 5, 2005, for PM _{2.5} .
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.

¹Attainment effective October 23, 2001, for the 1-hour ozone standard for the Louisville area, including Clark County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.

- (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. Clark 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}**
Clark County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5.
- (c) **Other Criteria Pollutants**
Clark County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Status of the Existing Source

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

This PTE table is from Appendix A of administrative amendment letter No. 019-32801-00103, issued on February 25, 2013.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)*									
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Spray Booths (SB-1, SB-2, SB-3, and SB-4)	38.05	38.05	38.05	-	-	98.71 ¹	-	-	3.63	3.19 HDI
Natural Gas Ovens (CO-1, CO-2, and CO-3)	0.02	0.09	0.09	0.007	1.20	0.07	1.01	1,454.20	0.02	0.02 Hexane
Natural Gas Combustion Units (RH1, RH2, L1, and AR1 through AR4)	0.05	0.20	0.20	0.016	2.65	0.15	2.22	3,193.94	0.05	0.057 Hexane
Injection Molding Machines	0.36	0.36	0.36	0.00	0.000	0.99	0.01	-	0.49	0.194 Styrene
Total PTE of Entire Source	38.48	38.70	38.70	0.023	3.85	99.91	3.24	4,648.14	4.19	3.19 HDI
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	NA	250	250	250	250	NA	NA	NA
Subject to Regulation	NA	NA	NA	NA	NA	NA	NA	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA	NA
negl. = negligible *These emissions are based upon Appendix A to the administrative amendment letter No. 019-32801-00103. **The 100,000 CO ₂ e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD. ¹ Compliance with this limit renders the requirements in 326 IAC 2-7 (Part 70 Permit Program) not applicable.										

- (a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3), because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
- (d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO₂ equivalent (CO₂e) emissions per year.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Mitchell Plastics on May 21, 2014, relating to the following:

- (a) Replacement of the current spray booth, identified as SB-2, with a new more efficient spray booth. The new spray booth will keep the identifier SB-2.
- (b) Removal of Injection Molding Unit 2516 from the facility.
- (c) Addition of three (3) new injection molding units, identified as 305T, 450T, and 860T.

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

- (a) One (1) spray booth, identified as SB-2, approved in 2014 for construction, equipped with two (2) manual or robotic HVLP spray gun or an equivalent spray method with higher transfer efficiency, for plastic parts surface coating, with a maximum capacity of 636 units per hour, using water baffles for overspray control, with a flash off area (FO-2), and exhausting to two (2) stacks SPK-2 and SSB-2.
- (b) Three (3) closed injection molding machines, all exhausting to the inside of the building:
 - (1) One (1) 180-Ton Injection Molding Machine, identified as D.A. #305T, with a maximum throughput rate of 182 pounds of resin per hour, approved in 2014 for construction.
 - (2) One (1) 180-Ton Injection Molding Machine, identified as D.A. #450T, with a maximum throughput rate of 150 pounds of resin per hour, approved in 2014 for construction.
 - (3) One (1) 180-Ton Injection Molding Machine, identified as D.A. #860T, with a maximum throughput rate of 60 pounds of resin per hour, approved in 2014 for construction.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)									
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Spray Booth SB-2	5.93	5.93	5.93	-	-	50.85	-	-	2.87	2.52 HDI
Injection Molding Machines 305T, 450T, 860T	5.92E-02	5.92E-02	5.92E-02	-	6.87E-05	0.23	1.72E-03	-	0.135	0.104 Styrene
Total PTE of Proposed Revision	5.94	5.94	5.94	-	6.87E-05	51.08	1.72E-03	-	3.005	2.52 HDI

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves the construction of new emission units with potential to emit greater than or equal to twenty-five (25) tons per year of Volatile Organic Compounds (VOC).

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source (reflecting adjustment of existing limits), with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)									
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Spray Booths (SB-1, SB-2, SB-3, and SB-4)	38.05 33.14	38.05 33.14	38.05 33.14	-	-	98.71 ¹	-	-	3.63 6.50	3.19 5.71 HDI
Natural Gas Ovens (CO-1, CO-2, and CO-3)	0.02	0.09	0.09	0.007	1.20	0.07	1.01	4,454.20 1,453.99	0.02	0.02 Hexane
Natural Gas Combustion Units (RH1, RH2, L1, and AR1 through AR4)	0.05	0.20	0.20	0.016	2.65	0.15	2.22	3,193.94 3,193.49	0.05	0.057 0.048 Hexane
Injection Molding Machines	0.36 0.31	0.36 0.31	0.36 0.31	0.00	0.000 3.65E-04	0.99 0.95	0.01	-	0.49 0.62	0.194 0.470 Styrene
Total PTE of Entire Source	38.48 33.53	38.70 33.75	38.70 33.75	0.023	3.85	99.94 99.87	3.24	4,648.14 4,647.48	4.19 7.19	3.19 5.71 HDI
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	NA	250	250	250	250	NA	NA	NA
Subject to Regulation	NA	NA	NA	NA	NA	NA	NA	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA	NA

- = 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.
¹Compliance with this limit renders the requirements in 326 IAC 2-7 (Part 70 Permit Program) not applicable. **Each spray booth is limited to less than 25 tons per year of VOC to render 326 IAC 8-1-6 not applicable.**

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted.)

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)									
	PM	PM10*	PM2.5*	SO ₂	NOx	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Spray Booths (SB-1, SB-2, SB-3, and SB-4)	33.14	33.14	33.14	-	-	98.71 ¹	-	-	6.50	5.71 HDI
Natural Gas Ovens (CO-1, CO-2, and CO-3)	0.02	0.09	0.09	0.007	1.20	0.07	1.01	1,453.9 9	0.02	0.02 Hexane
Natural Gas Combustion Units (RH1, RH2, L1, and AR1 through AR4)	0.05	0.20	0.20	0.016	2.65	0.15	2.22	3,193.4 9	0.05	0.048 Hexane
Injection Molding Machines	0.31	0.31	0.31	0.00	3.65E-04	0.95	0.01	-	0.62	0.470 Styrene
Total PTE of Entire Source	33.53	33.75	33.75	0.023	3.85	99.87	3.24	4,647.4 8	7.19	5.71 HDI
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	NA	250	250	250	250	NA	NA	NA
Subject to Regulation	NA	NA	NA	NA	NA	NA	NA	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA	NA
- = 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 CO ₂ e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD. ¹ Compliance with this limit renders the requirements in 326 IAC 2-7 (Part 70 Permit Program) not applicable. Each spray booth is limited to less than 25 tons per year of VOC to render 326 IAC 8-1-6 not applicable.										

(a) FESOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants, HAPs and CO₂e from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

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

- (1) The VOC input (including dilution and cleaning solvents) to spray booths SB-1, SB-2, SB-3, and SB-4 combined shall be less than 98.71 tons per twelve (12) consecutive month period, with compliance determined at the end of the month.

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

- (b) PSD Minor Source – PM
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit PM from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) Emission Offset Minor Source
This modification to an existing Emission Offset minor stationary source will not change the Emission Offset minor status, because the potential to emit of all nonattainment regulated pollutants from the entire source will continue to be less than the Emission Offset major source threshold levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

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

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) 326 IAC 2-3 (Emission Offset) and 326 IAC 2-1.1-5 (Nonattainment New Source Review)
This modification to an existing Emission Offset minor stationary source will not change the Emission Offset minor status, because the potential to emit of all nonattainment regulated pollutants from the entire source will continue to be less than the Emission Offset major source threshold levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

This modification to an existing minor stationary source under 326 IAC 2-1.1-5 (Nonattainment New Source Review) will not change the minor status, because the potential to emit of PM_{2.5} from the entire source will continue to be less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

Note: The source is considered a minor HAP source.

- (e) 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.

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

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

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

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

- (h) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.

- (i) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Spray Booth SB-2

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Spray booth SP-2 is subject to a particulate matter limitation specified in 326 IAC 6.5 that is as stringent or more stringent than the particulate limitation established in 326 IAC 6-3.
- (b) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(h), surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the source shall operate the control device in accordance with manufacturer's specifications.

Note: This is a new requirement.

- (c) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The unlimited VOC potential emissions from the new spray booth, identified as SB-2, is greater than twenty-five (25) tons per year. However, the source shall limit the VOC potential emissions from the new spray booth to less than twenty-five (25) tons per year. Therefore, the proposed revision is not subject to the requirements of 326 IAC 8-1-6.

In order to render the requirements of 326 IAC 8-1-6 not applicable, the spray booth identified as SB-2 shall be limited as follows:

- (1) The volatile organic compounds (VOC) input (including dilution and cleaning solvents) to the spray booth, identified as SB-2, shall be less than twenty-five (25) tons per year per twelve (12) consecutive month period each, with compliance determined at the end of each month.

Compliance with this limit shall limit the potential to emit VOC from the spray booth SB-2 to less than twenty-five (25) tons per 12 consecutive month period and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

Closed Injection Molding

- (a) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), the closed injection molding operations, identified as 305T, 450T, and 860T, are subject to the particulate matter (PM) limit of 0.03 grains per dry standard cubic foot of exhaust gas (gr/dscf), each.
- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The proposed addition of close injection molding units, identified as 305T, 450T, and 860T, are not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from the closed injection molding units are less than twenty-five (25) tons per year.

Spray Booths SB-1, SB-3, and SB-4

- (a) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
On March 21, 2012, 326 IAC 6.5 (Particulate Matter Limitations Except Lake County) was amended. As a result of this change, the applicability of 326 IAC 6.5 is being reevaluated for the existing spray booths, identified as SB-1, SB-3, and SB-4.

Pursuant to 326 IAC 6.5-1-2(h), surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the source shall operate the control device in accordance with manufacturer's specifications.

This is a change in the applicability. This is a new requirement.

Compliance Determination, Monitoring and Testing Requirements
--

- (a) The compliance determination and monitoring requirements applicable to this proposed revision are as follows:

Emission Unit/Control	Operating Parameters	Frequency
SB-2/Water Baffles	Stack Overspray	Once a week
	Visible Emissions	Once a month

These compliance monitoring requirements are necessary when SB-2 is in operation because the water baffles must operate properly to ensure compliance with 326 IAC 6.5-1-2(h) (Particulate Matter Limitations Except Lake County).

The existing compliance requirements for SB-1, SB-3, SB-4 and will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP No: 019-30695-00103, issued on December 19, 2011.

Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

1. Section A.2 and D.1 has been updated with a new description for spray booth SB-2.
2. Section A.2 and D.2 has been updated with the three new injection molding units and the removal of the Injection Molding Unit 2516.
3. Condition D.1.3 has been updated to accurately reflect the change in the rule for the new spray booth SB-2 and the existing spray booths SB-1, SB-3, and SB-4.
4. The descriptive information for injection molding unit D.A. #2277 was updated in Section D.2 to match the descriptive information in Section A.2.
5. The FESOP Quarterly Reports were updated to include the quarter.

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

- ...
- (b) One (1) spray booth, identified as SB-2, installed in November 2000, **approved in 2014 for construction**, equipped with two (2) manual or robotic HVLP spray gun or an equivalent spray method with higher transfer efficiency, for plastic parts surface coating, with a maximum capacity of 636 units per hour, using water baffles for overspray control, with a flash off area (FO-2), and exhausting to two (2) stacks SPK-2, and SSB-2.

This spray booth replaces an existing spray booth that was installed in November 2000.

- ...
- (h) ~~Forty-seven (47)~~**Forty-nine (49)** closed injection molding machines, **no control**, and all exhausting to the inside of the building including the following:

...

(24) ~~One (1) 180-Ton Injection Molding Machine, identified as D.A. #2516, with a maximum throughput rate of 24 pounds of resin per hour, approved for construction in 2012.~~**One (1) 180-Ton Injection Molding Machine, identified as D.A. #305T, with a maximum throughput rate of 182 pounds of resin per hour, approved in 2014 for construction.**

(25) **One (1) 180-Ton Injection Molding Machine, identified as D.A. #450T, with a maximum throughput rate of 150 pounds of resin per hour, approved in 2014 for construction.**

(26) **One (1) 180-Ton Injection Molding Machine, identified as D.A. #860T, with a maximum throughput rate of 60 pounds of resin per hour, approved in 2014 for construction.**

(~~25~~27) One (1) 180-Ton Injection Molding Machine, identified as D.A. #2517, with a maximum throughput rate of 88 pounds of resin per hour, approved for construction in 2012.

- (~~2628~~) One (1) 200-Ton Injection Molding Machine, identified as D.A. #272, with a maximum throughput rate of 17.65 pounds of resin per hour.
- (~~2729~~) One (1) 220-Ton Injection Molding Machine, identified as D.A. #1196, with a maximum throughput rate of 20.96 pounds of resin per hour.
- (~~2830~~) One (1) 220-Ton Injection Molding Machine, identified as D.A. #1195, with a maximum throughput rate of 27.21 pounds of resin per hour.
- (~~2931~~) One (1) 280-Ton Injection Molding Machine, identified as D.A. #569, with a maximum throughput rate of 29.29 pounds of resin per hour.
- (~~3032~~) One (1) 280-Ton Injection Molding Machine, identified as D.A. #2518, with a maximum throughput rate of 16.5 pounds of resin per hour, approved for construction in 2012.
- (~~3133~~) One (1) 350-Ton Injection Molding Machine, identified as D.A. #2278, approved in 2011 for construction, with a maximum throughput rate of 115.0 pounds of resin per hour.
- (~~3234~~) One (1) 350-Ton Injection Molding Machine, identified as D.A. #568, with a maximum throughput rate of 25.80 pounds of resin per hour.
- (~~3335~~) One (1) 350-Ton Injection Molding Machine, identified as D.A. #565, with a maximum throughput rate of 106.23 pounds of resin per hour.
- (~~3436~~) One (1) 350-Ton Injection Molding Machine, identified as D.A. #368, with a maximum throughput rate of 20.72 pounds of resin per hour.
- (~~3537~~) One (1) 350-Ton Injection Molding Machine, identified as D.A. #567, with a maximum throughput rate of 8.04 pounds of resin per hour.
- (~~3638~~) One (1) 350-Ton Injection Molding Machine, identified as D.A. #566, with a maximum throughput rate of 14.90 pounds of resin per hour.
- (~~3739~~) One (1) 350-Ton Injection Molding Machine, identified as D.A. #564, with a maximum throughput rate of 14.90 pounds of resin per hour.
- (~~3840~~) One (1) 350-Ton Injection Molding Machine, identified as D.A. #1013, with a maximum throughput rate of 61.22 pounds of resin per hour.
- (~~3941~~) One (1) 350-Ton Injection Molding Machine, identified as D.A. #2035, transfer machine, with a maximum throughput rate of 115.0 pounds of resin per hour.
- (~~4042~~) One (1) 350-Ton Injection Molding Machine, identified as D.A. # 2513, with a maximum throughput rate of 116 pounds of resin per hour, approved for construction in 2012.
- (~~4143~~) One (1) 350-Ton Injection Molding Machine, identified as D.A. # 2514, with a maximum throughput rate of 116 pounds of resin per hour, approved for construction in 2012.
- (~~4244~~) One (1) 350-Ton Injection Molding Machine, identified as D.A. # 2515, with a maximum throughput rate of 116 pounds of resin per hour, approved for construction in 2012.
- (~~4345~~) One (1) 390-Ton Injection Molding Machine, identified as D.A. #2099, with a maximum throughput rate of 12.49 pounds of resin per hour.

- (4446) One (1) 450-Ton Injection Molding Machine, identified as D.A. #1372, with a maximum throughput rate of 56.80 pounds of resin per hour.
- (4547) One (1) 450-Ton Injection Molding Machine, identified as D.A. #2282, with a maximum throughput rate of 59.56 pounds of resin per hour.
- (4648) One (1) 550-Ton Injection Molding Machine, identified as D.A. #668, with a maximum throughput rate of 41.50 pounds of resin per hour.
- (4749) One 55-Ton Injection Molding Machine, identified as D.A. #2348, with a maximum throughput rate of 77.19 pounds of resin per hour.

...
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

...
(b) One (1) spray booth, identified as SB-2, installed in November 2000, **approved in 2014 for construction**, equipped with two (2) manual or robotic HVLP spray gun or an equivalent spray method with higher transfer efficiency, for plastic parts surface coating, with a maximum capacity of 636 units per hour, using water baffles for overspray control, with a flash off area (FO-2), and exhausting to two (2) stacks SPK-2, and SSB-2.

This spray booth replaces an existing spray booth that was installed in November 2000.
...

...
D.1.3 Particulate Matter (PM) [326 IAC 6.5-1-2]

~~Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from spray booths SB-1, SB-2, SB-3 and SB-4 shall each not exceed three hundredths (0.03) grain per dry standard cubic foot (dscf).~~ Pursuant to **326 IAC 6.5-1-2(h), surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the source shall operate the control device in accordance with manufacturer's specifications.**

...
SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(h) ~~Forty-seven (47)~~**Forty-nine (49)** closed injection molding machines, **no control, and** all exhausting to the inside of the building including the following:

- ...
(6) One (1) 50-Ton Injection Molding Machine, identified as D.A. #2277, ~~constructed~~**approved** in 2011 for construction, with a maximum throughput rate of 115.0 pounds of resin per hour.
- ...
(24) **One (1) 180-Ton Injection Molding Machine, identified as D.A. #305T, with a maximum throughput rate of 182 pounds of resin per hour, approved in 2014 for construction.** ~~One (1) 180-Ton Injection Molding Machine, identified as D.A. #2516, with a maximum throughput rate of 24 pounds of resin per hour, approved for~~

~~construction in 2012.~~

- (25) One (1) 180-Ton Injection Molding Machine, identified as D.A. #450T, with a maximum throughput rate of 150 pounds of resin per hour, approved in 2014 for construction.**
- (26) One (1) 180-Ton Injection Molding Machine, identified as D.A. #860T, with a maximum throughput rate of 60 pounds of resin per hour, approved in 2014 for construction.**
- ~~(2527)~~ One (1) 180-Ton Injection Molding Machine, identified as D.A. #2517, with a maximum throughput rate of 88 pounds of resin per hour, approved for construction in 2012.
- ~~(2628)~~ One (1) 200-Ton Injection Molding Machine, identified as D.A. #272, with a maximum throughput rate of 17.65 pounds of resin per hour.
- ~~(2729)~~ One (1) 220-Ton Injection Molding Machine, identified as D.A. #1196, with a maximum throughput rate of 20.96 pounds of resin per hour.
- ~~(2830)~~ One (1) 220-Ton Injection Molding Machine, identified as D.A. #1195, with a maximum throughput rate of 27.21 pounds of resin per hour.
- ~~(2931)~~ One (1) 280-Ton Injection Molding Machine, identified as D.A. #569, with a maximum throughput rate of 29.29 pounds of resin per hour.
- ~~(3032)~~ One (1) 280-Ton Injection Molding Machine, identified as D.A. #2518, with a maximum throughput rate of 16.5 pounds of resin per hour, approved for construction in 2012.
- ~~(3133)~~ One (1) 350-Ton Injection Molding Machine, identified as D.A. #2278, approved in 2011 for construction, with a maximum throughput rate of 115.0 pounds of resin per hour.
- ~~(3234)~~ One (1) 350-Ton Injection Molding Machine, identified as D.A. #568, with a maximum throughput rate of 25.80 pounds of resin per hour.
- ~~(3335)~~ One (1) 350-Ton Injection Molding Machine, identified as D.A. #565, with a maximum throughput rate of 106.23 pounds of resin per hour.
- ~~(3436)~~ One (1) 350-Ton Injection Molding Machine, identified as D.A. #368, with a maximum throughput rate of 20.72 pounds of resin per hour.
- ~~(3537)~~ One (1) 350-Ton Injection Molding Machine, identified as D.A. #567, with a maximum throughput rate of 8.04 pounds of resin per hour.
- ~~(3638)~~ One (1) 350-Ton Injection Molding Machine, identified as D.A. #566, with a maximum throughput rate of 14.90 pounds of resin per hour.
- ~~(3739)~~ One (1) 350-Ton Injection Molding Machine, identified as D.A. #564, with a maximum throughput rate of 14.90 pounds of resin per hour.
- ~~(3840)~~ One (1) 350-Ton Injection Molding Machine, identified as D.A. #1013, with a maximum throughput rate of 61.22 pounds of resin per hour.

- (3941) One (1) 350-Ton Injection Molding Machine, identified as D.A. #2035, transfer machine, with a maximum throughput rate of 115.0 pounds of resin per hour.
 - (4042) One (1) 350-Ton Injection Molding Machine, identified as D.A. # 2513, with a maximum throughput rate of 116 pounds of resin per hour, approved for construction in 2012.
 - (4143) One (1) 350-Ton Injection Molding Machine, identified as D.A. # 2514, with a maximum throughput rate of 116 pounds of resin per hour, approved for construction in 2012.
 - (4244) One (1) 350-Ton Injection Molding Machine, identified as D.A. # 2515, with a maximum throughput rate of 116 pounds of resin per hour, approved for construction in 2012.
 - (4345) One (1) 390-Ton Injection Molding Machine, identified as D.A. #2099, with a maximum throughput rate of 12.49 pounds of resin per hour.
 - (4446) One (1) 450-Ton Injection Molding Machine, identified as D.A. #1372, with a maximum throughput rate of 56.80 pounds of resin per hour.
 - (4547) One (1) 450-Ton Injection Molding Machine, identified as D.A. #2282, with a maximum throughput rate of 59.56 pounds of resin per hour.
 - (4648) One (1) 550-Ton Injection Molding Machine, identified as D.A. #668, with a maximum throughput rate of 41.50 pounds of resin per hour.
 - (4749) One 55-Ton Injection Molding Machine, identified as D.A. #2348, with a maximum throughput rate of 77.19 pounds of resin per hour.
- (The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

...

FESOP Quarterly Report

...

Facility: Spray Booth SB-1

...

Quarter: _____ YEAR: _____

...

FESOP Quarterly Report

...

Facility: Spray Booth SB-2

...

Quarter: _____ YEAR: _____

...

FESOP Quarterly Report

...

Facility: Spray Booth SB-3

... Quarter: _____ YEAR: _____

... FESOP Quarterly Report

... Facility: Spray Booth SB-4

... Quarter: _____ YEAR: _____

... FESOP Quarterly Report

... Facility: Spray Booths SB-1, SB-2, SB-3 and SB-4

... Quarter: _____ YEAR: _____

... **Additional Changes**

IDEM, OAQ made additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

1. IDEM, OAQ has added the Southeastern Regional Office to Section B - Emergency Provisions.
2. IDEM is changing the Section C Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.
3. IDEM clarified Condition C.10 to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.
4. IDEM added "where applicable" to the lists in Section C - General Record Keeping Requirements to more closely match the underlying rule.

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

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

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

... **C.9 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

- (a) **For new units:**
Unless otherwise specified in the approval for the new emission unit(s),

compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance ~~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 start-up, whichever is later,~~ the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

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

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

...

C.14 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

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

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

...

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 May 21, 2014.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 019-34555-00103. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brandon Miller at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5373 or toll free at 1-800-451-6027 extension 4-5373.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations
Source-wide Summary**

Company Name: Mitchell Plastics
Address City IN Zip: 301 Pike Street
 Charlestown, Indiana 47111
Operation Permit Number: F019-30695-00103
SPR Permit Number: F019-34555-00103
Reviewer: Brandon Miller

Uncontrolled PTE (tons/year) after Revision of Source										
Emission Unit	PM (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	GHGs as CO2e (tons/yr)	Total HAP (tons/yr)	Single HAP (tons/yr)
Spray Booths (SB-1, SB-2, SB-3 and SB-4)*	33.14	33.14	33.14	-	-	140.22	-	-	6.50	5.71 (HDI)
Natural Gas Ovens (CO-1, CO-2 and CO-3)	0.02	0.09	0.09	0.01	1.20	0.07	1.01	1,453.99	0.023	0.02 (Hexane)
Natural Gas Combustion Units (RH1, RH2, L1, AR1 through AR4)	0.05	0.20	0.20	0.02	2.65	0.15	2.22	3,193.49	0.05	0.048 (Hexane)
Injection Molding Machines	0.31	0.31	0.31	0.00	0.000	0.95	0.01	-	0.62	0.470 (Styrene)
Total	33.53	33.75	33.75	0.02	3.85	141.38	3.24	4,647.48	7.19	5.71 (HDI)

- = negligible
 * VOC from the spray booths is from 2 parts solution

Limited PTE (tons/year) after Revision of Source										
Emission Unit	PM (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	¹ VOC (tons/yr)	CO (tons/yr)	GHGs as CO2e (tons/yr)	Total HAP (tons/yr)	Single HAP (tons/yr)
Spray Booths (SB-1, SB-2, SB-3 and SB-4)	33.14	33.14	33.14	-	-	98.71	-	-	6.50	5.71 (HDI)
Natural Gas Ovens (CO-1, CO-2 and CO-3)	0.02	0.09	0.09	0.007	1.20	0.07	1.01	1,453.99	0.02	0.02 (Hexane)
Natural Gas Combustion Units (RH1, RH2, L1, AR1 through AR4)	0.05	0.20	0.20	0.016	2.65	0.15	2.22	3,193.49	0.05	0.048 (Hexane)
Injection Molding Machines	0.31	0.31	0.31	0.00	3.65E-04	0.95	0.01	-	0.62	0.470 (Styrene)
Total	33.53	33.75	33.75	0.023	3.85	99.87	3.24	4,647.48	7.19	5.71 (HDI)

- = negligible

Note 1: In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7, the Permittee shall comply with the following:

The VOC input to spray booths SB-1, SB-2, SB-3 and SB-4 combined shall be less than 98.7 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC from the entire source to less than 100 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-7 not applicable.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Mitchell Plastics
Address City IN Zip: 301 Pike Street
Charlestown, Indiana 47111
Operation Permit Number: F019-30695-00103
AA Permit Number: F019-34555-00103
Reviewer: Brandon Miller

Material		Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)		Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency		
SB-1		8.94	75.75%	52.02%	23.73%	55.83%	24.25%	0.0118		240	4.80	2.12	6.01	144.19	26.31	9.41	8.75	65%		
Solvent		6.55	100.0%	0.0%	100.0%	0.0%	0.00%	0.02974		1.000	6.55	6.55	0.19	4.68	0.85	0.00	N/A	0%		
															27.17	9.41				
SB-2 Mix Ratio								Gal of Mat. (gal/unit) of Mix	Gal of Mat. (gal/unit) per Component											
Basecoat	6	7.98	70.81%	0.0%	70.8%	0.0%	23.12%	0.00303	0.00165	636	5.65	5.65	5.94	142.55	26.02	3.75	24.44	65%		
Thinner	4	6.9	100.00%	0.0%	100.0%	0.0%	0.00%	0.00303	0.00110	636	6.90	6.90	4.84	116.05	21.18	0.00	N/A	0%		
Urethane Hardner	1	8.100	N/A	0.0%	N/A	0.0%	35.00%	0.00303	0.00028	636	4.77	4.77	0.84	20.06	3.66	2.18	N/A	65%		
															11	50.85	5.93			
¹SB-3 Mix Ratio								Gal of Mat. (gal/unit) of Mix	Gal of Mat. (gal/unit) per Component											
Basecoat (Silver 11SV18)	5.6	8.11	66.21%	0.00%	66.21%	0.00%	26.62%	0.005	0.0026	240	5.37	5.37	3.34	80.19	14.63	5.83	20.17	22%		
Thinner (SV4380)	4.2	6.92	100.00%	0.00%	100.00%	0.00%	0.00%	0.005	0.0019	240	6.92	6.92	3.23	77.50	14.14	0.00	N/A	0%		
² Urethane Hardener	1	8.10	N/A	0.00%	N/A	0.00%	35.00%	0.005	0.0005	240	4.77	4.77	0.53	12.71	2.32	3.07	N/A	22%		
															10.8	31.10	8.90			
¹SB-4 Mix Ratio								Gal of Mat. (gal/unit) of Mix	Gal of Mat. (gal/unit) per Component											
Basecoat (Silver 11SV18)	5.6	8.11	66.21%	0.00%	66.21%	0.00%	26.62%	0.005	0.0026	240	5.37	5.37	3.34	80.19	14.63	5.83	20.17	22%		
Thinner (SV4380)	4.2	6.92	100.00%	0.00%	100.00%	0.00%	0.00%	0.005	0.0019	240	6.92	6.92	3.23	77.50	14.14	0.00	N/A	0%		
² Urethane Hardener	1	8.10	N/A	0.00%	N/A	0.00%	35.00%	0.005	0.0005	240	4.77	4.77	0.53	12.71	2.32	3.07	N/A	22%		
															10.8	31.10	8.90			

Note 1: For the mixture used in SB-3 and proposed SB-4, the gallons per unit of the mixture was converted to gallon per unit of each component based on the Mix Ratio and the gallons per unit of each component was used to calculate the PTE as shown in the Methodology.

Note 2: This information shown as N/A is not listed on the MSDS sheet, therefore not used in the calculation, however, the MSDS sheet does list the VOC content of the hardener as 4.768 lbs/gal which is used in these calculations.

State Potential Emissions

Add worst case coating to all solvents

Total PTE (tons/yr) 24.91 597.92
Dry Filter Particulate Control Efficiency is 80%
Total Controlled PTE (tons/yr)

Potential VOC tons per year	Particulate Potential (ton/yr)
140.22	33.14

140.22 6.63

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations
HAP Emission Calculations**

Company Name: Mitchell Plastics
Address City IN Zip: 301 Pike Street
Charlestown, Indiana 47111
Operation Permit Number: F019-30695-00103
AA Permit Number: F019-34555-00103
Reviewer: Brandon Miller

Material	Mix Ratio	Density (Lb/Gal)	Gallons of Material (gal/unit)	Gal of Mat. (gal/unit) per Component	Maximum (unit/hour)	Weight % Xylene	Weight % Hexamethylene diisocyanate (HDI)	Weight % Benzene	Xylene Emissions (ton/yr)	Hexamethylene diisocyanate (HDI) Emissions (ton/yr)	Benzene Emissions (ton/yr)
SB-2											
Basecoat	6	7.98	0.00303	0.00165	636	0.00%	0.00%	0.00%	0.00	0.00	0.00
Thinner	4	6.9	0.00303	0.00110	636	0.00%	0.00%	0.00%	0.00	0.00	0.00
Urethane Hardner	1	8.1	0.00303	0.00028	636	5.60%	40.50%	0.00%	0.35	2.52	0.00
	11								0.35	2.52	0.00

Material	Mix Ratio	Density (Lb/Gal)	Gallons of Material (gal/unit)	Gal of Mat. (gal/unit) per Component	Maximum (unit/hour)	Weight % Xylene	Weight % Hexamethylene diisocyanate (HDI)	Weight % Benzene	Xylene Emissions (ton/yr)	Hexamethylene diisocyanate (HDI) Emissions (ton/yr)	Benzene Emissions (ton/yr)
¹SB-3											
Basecoat (Silver 11SV18)	5.6	8.11	0.005	0.0026	240	0.00%	0.00%	0.00%	0.00	0.00	0.00
Thinner (SV4380)	4.2	6.92	0.005	0.0019	240	0.00%	0.00%	0.00%	0.00	0.00	0.00
² Urethane Hardener	1	8.10	0.005	0.0005	240	5.60%	40.50%	0.00%	0.22	1.60	0.00
	10.8								0.22	1.60	0.00

Material	Mix Ratio	Density (Lb/Gal)	Gallons of Material (gal/unit)	Gal of Mat. (gal/unit) per Component	Maximum (unit/hour)	Weight % Xylene	Weight % Hexamethylene diisocyanate (HDI)	Weight % Benzene	Xylene Emissions (ton/yr)	Hexamethylene diisocyanate (HDI) Emissions (ton/yr)	Benzene Emissions (ton/yr)
¹SB-4 (proposed booth)											
Basecoat (Silver 11SV18)	5.6	8.11	0.005	0.0026	240	0.00%	0.00%	0.00%	0.00	0.00	0.00
Thinner (SV4380)	4.2	6.92	0.005	0.0019	240	0.00%	0.00%	0.00%	0.00	0.00	0.00
² Urethane Hardener	1	8.10	0.005	0.0005	240	5.60%	40.50%	0.00%	0.22	1.60	0.00
	10.8								0.22	1.60	0.00

Total Single HAP Potential Emissions (tons/yr) **0.790** **5.710** **0.000**
 Total Combined HAP Potential Emissions (tons/yr) **6.500**

Note 1: For the mixture used in SB-3 and proposed SB-4, the gallons per unit of the mixture was converted to gallon per unit of each component based on the Mix Ratio and the gallons per unit of each component was used to calculate the PTE as shown in the Methodology.

Note 2: The weight % volatile and weight % water were not listed on the MSDS sheet. The MSDS sheet does list the VOC as 4.768 lbs/gal which is used in these calculations.

SB - 1 and SB-2 use materials containing MEK, which was delisted as of December 19, 2005, from HAP list. Therefore, there are no HAP emissions from SB-1 or SB-2.

Prior to Revision SB-3 also used materials containing MEK, which was delisted as of December 19, 2005, from HAP list. Therefore, there were no HAP emissions from SB-1, SB-2, or SB-3 until SB-3 began using the material that contained HAPs Xylene and HDI.

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

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

Company Name: Mitchell Plastics
Address City IN Zip: 301 Pike Street
 Charlestown, Indiana 47111
Operation Permit Number: F019-30695-00103
AA Permit Number: F019-34555-00103
Reviewer: Brandon Miller

Unit description	Unit number	MMBtu/hr
Cure Oven	CO-1	1.00
Cure Oven	CO-2	1.00
Cure Oven	CO-3	0.75
Total	all units	2.75

Heat Input Capacity
MMBtu/hr

2.75

Total for all natural gas-fired emission units

Potential Throughput
MMCF/yr

24.1

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	PM2.5	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.02	0.09	0.09	0.01	1.20	0.07	1.01

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 is assumed to be equal to PM10.

**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/1,000 MMBtu

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

HAPs emissions calculations.

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Potential Emission in tons/yr	2.53E-05	1.45E-05	0.001	0.022	4.10E-05

Emission Factor in lb/MMcf	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Potential Emission in tons/yr	6.02E-06	1.32E-05	1.69E-05	4.58E-06	2.53E-05	0.023

Methodology is the same the previous page.

TOTAL HAPS: 0.023

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 Emissions

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
Potential Emission in tons/yr	1,445.40	0.03	0.03
Summed Potential Emissions in tons/yr		1,445.45	
CO2e Total in tons/yr		1,453.99	

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.

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

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).

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

Company Name: Mitchell Plastics
Address City IN Zip: 301 Pike Street
 Charlestown, Indiana 47111
Operation Permit Number: F019-30695-00103
AA Permit Number: F019-34555-00103
Reviewer: Brandon Miller

Unit description	Unit number	MMBtu/hr
Radiant Heater	RH1	0.40
Radiant Heater	RH2	0.40
Lennox Heater	L1	0.24
Air Rotation Unit	AR1	1.25
Air Rotation Unit	AR2	1.25
Air Rotation Unit	AR3	1.25
Air Rotation Unit	AR4	1.25
Total	all units	6.04

Heat Input Capacity
MMBtu/hr

6.04

Total for all natural gas-fired
emission units

Potential Throughput
MMCF/yr

52.9

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	PM2.5	SO2	NOx 100	VOC	CO
	1.9	7.6	7.6	0.6	**see below	5.5	84
Potential Emission in tons/yr	0.05	0.20	0.20	0.02	2.65	0.15	2.22

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 is assumed to be equal to PM10.

**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/1,000 MMBtu

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

HAPs Emissions calculations.

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	5.56E-05	3.17E-05	0.002	0.048	8.99E-05

Emission Factor in lb/MMcf	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.32E-05	2.91E-05	3.70E-05	1.01E-05	5.56E-05	0.050

Methodology is the same the previous page.

TOTAL HAPS: 0.050

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 Emissions

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	3,174.62	0.06	0.06
Summed Potential Emissions in tons/yr		3,174.74	
CO2e Total in tons/yr		3,193.49	

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.

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

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).

Appendix A: Emissions Calculations
Potential to Emit Criteria Air Pollutants from the Injection Molding Machines
Processing Polypropylene with a 505 °F Melt Temperature

Company Name: Mitchell Plastics
Address City IN Zip: 301 Pike Street
Charlestown, Indiana 47111
Operation Permit Number: F019-30695-00103
AA Permit Number: F019-34555-00103
Reviewer: Brandon Miller

D.A. Inc	Resin Type	Max Throughput Rate (lbs resin/hr)	PM			VOC			⁽⁵⁾ CO			⁽⁵⁾ NO _x		
			Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)
562	⁽³⁾ POM	9.76	34.5	3.37E-04	1.47E-03	80.3	7.84E-04	3.43E-03	1.00	9.76E-06	4.27E-05	0.04	3.90E-07	1.71E-06
959	⁽¹⁾ PP	8.77	34.5	3.03E-04	1.33E-03	80.3	7.04E-04	3.08E-03	1.00	8.77E-06	3.84E-05	0.04	3.51E-07	1.54E-06
561	⁽¹⁾ PP	1.98	34.5	6.83E-05	2.99E-04	80.3	1.59E-04	6.96E-04	1.00	1.98E-06	8.67E-06	0.04	7.92E-08	3.47E-07
1151	⁽³⁾ PP	4.44	34.5	1.53E-04	6.71E-04	80.3	3.57E-04	1.56E-03	1.00	4.44E-06	1.94E-05	0.04	1.78E-07	7.78E-07
563	⁽³⁾ PBT	13.73	34.5	4.74E-04	2.07E-03	80.3	1.10E-03	4.83E-03	1.00	1.37E-05	6.01E-05	0.04	5.49E-07	2.41E-06
2277	⁽¹⁾ PP	115.00	34.5	3.97E-03	1.74E-02	80.3	9.23E-03	4.04E-02	1.00	1.15E-04	5.04E-04	0.04	4.60E-06	2.01E-05
2245	⁽²⁾ ABS	3.74	34.5	1.29E-04	5.65E-04	199	7.44E-04	3.26E-03	1.00	3.74E-06	1.64E-05	0.04	1.50E-07	6.55E-07
578	⁽³⁾ POM	9.23	34.5	3.18E-04	1.39E-03	80.3	7.41E-04	3.25E-03	1.00	9.23E-06	4.04E-05	0.04	3.69E-07	1.62E-06
2006	⁽⁴⁾ PA6/GF30	10.89	24	2.61E-04	1.14E-03	65	7.08E-04	3.10E-03	1.00	1.09E-05	4.77E-05	0.04	4.36E-07	1.91E-06
576	⁽²⁾ ABS	13.58	34.5	4.69E-04	2.05E-03	199	2.70E-03	1.18E-02	1.00	1.36E-05	5.95E-05	0.04	5.43E-07	2.38E-06
1007	⁽¹⁾ PP	5.45	34.5	1.88E-04	8.24E-04	80.3	4.38E-04	1.92E-03	1.00	5.45E-06	2.39E-05	0.04	2.18E-07	9.55E-07
2242	⁽¹⁾ PP/GF10	4.05	34.5	1.40E-04	6.12E-04	80.3	3.25E-04	1.42E-03	1.00	4.05E-06	1.77E-05	0.04	1.62E-07	7.10E-07
2244	⁽¹⁾ PP/GF10	59.40	34.5	2.05E-03	8.98E-03	80.3	4.77E-03	2.09E-02	1.00	5.94E-05	2.60E-04	0.04	2.38E-06	1.04E-05
288	⁽³⁾ POM	29.85	34.5	1.03E-03	4.51E-03	80.3	2.40E-03	1.05E-02	1.00	2.99E-05	1.31E-04	0.04	1.19E-06	5.23E-06
573	⁽²⁾ ABS	11.87	34.5	4.10E-04	1.79E-03	199	2.36E-03	1.03E-02	1.00	1.19E-05	5.20E-05	0.04	4.75E-07	2.08E-06
962	⁽⁴⁾ PA6/GF30	16.16	24	3.88E-04	1.70E-03	65	1.05E-03	4.60E-03	1.00	1.62E-05	7.08E-05	0.04	6.46E-07	2.83E-06
1029	⁽¹⁾ PP	24.09	34.5	8.31E-04	3.64E-03	80.3	1.93E-03	8.47E-03	1.00	2.41E-05	1.06E-04	0.04	9.64E-07	4.22E-06
1030	⁽¹⁾ PP	21.96	34.5	7.58E-04	3.32E-03	80.3	1.76E-03	7.72E-03	1.00	2.20E-05	9.62E-05	0.04	8.78E-07	3.85E-06
1200	⁽³⁾ PBT	17.09	34.5	5.90E-04	2.58E-03	80.3	1.37E-03	6.01E-03	1.00	1.71E-05	7.49E-05	0.04	6.84E-07	2.99E-06
572	⁽²⁾ ABS	24.51	34.5	8.46E-04	3.70E-03	199	4.88E-03	2.14E-02	1.00	2.45E-05	1.07E-04	0.04	9.80E-07	4.29E-06
570	⁽³⁾ PBT	14.27	34.5	4.92E-04	2.16E-03	80.3	1.15E-03	5.02E-03	1.00	1.43E-05	6.25E-05	0.04	5.71E-07	2.50E-06
272	⁽¹⁾ PP	17.65	34.5	6.09E-04	2.67E-03	80.3	1.42E-03	6.21E-03	1.00	1.77E-05	7.73E-05	0.04	7.06E-07	3.09E-06
305T	ABS	182.00	34.5	6.28E-03	2.75E-02	199	3.62E-02	1.59E-01	1.00	1.82E-04	7.97E-04	0.04	7.28E-06	3.19E-05
450T	⁽¹⁾ PP	150.00	34.5	5.18E-03	2.27E-02	80.3	1.20E-02	5.29E-02	1.00	1.50E-04	6.57E-04	0.04	6.00E-06	2.63E-05
860T	⁽¹⁾ PP	60.00	34.5	2.07E-03	9.07E-03	80.3	4.82E-03	2.11E-02	1.00	6.00E-05	2.63E-04	0.04	2.40E-06	1.05E-05
2517	PP	88.00	34.5	3.04E-03	1.33E-02	80.3	7.07E-03	3.10E-02	1.00	8.80E-05	3.85E-04	0.04	3.52E-06	1.54E-05
1196	⁽¹⁾ PP	20.96	34.5	7.23E-04	3.17E-03	80.3	1.68E-03	7.37E-03	1.00	2.10E-05	9.18E-05	0.04	8.38E-07	3.67E-06
1195	⁽¹⁾ PP	27.21	34.5	9.39E-04	4.11E-03	80.3	2.18E-03	9.57E-03	1.00	2.72E-05	1.19E-04	0.04	1.09E-06	4.77E-06
569	⁽¹⁾ PP	29.29	34.5	1.01E-03	4.43E-03	80.3	2.35E-03	1.03E-02	1.00	2.93E-05	1.28E-04	0.04	1.17E-06	5.13E-06
2278	⁽¹⁾ PP	115.00	34.5	3.97E-03	1.74E-02	80.3	9.23E-03	4.04E-02	1.00	1.15E-04	5.04E-04	0.04	4.60E-06	2.01E-05
568	⁽¹⁾ PP	25.80	34.5	8.90E-04	3.90E-03	80.3	2.07E-03	9.07E-03	1.00	2.58E-05	1.13E-04	0.04	1.03E-06	4.52E-06
565	⁽¹⁾ PP	106.23	34.5	3.66E-03	1.61E-02	80.3	8.53E-03	3.74E-02	1.00	1.06E-04	4.65E-04	0.04	4.25E-06	1.86E-05
368	⁽¹⁾ PP	20.72	34.5	7.15E-04	3.13E-03	80.3	1.66E-03	7.29E-03	1.00	2.07E-05	9.08E-05	0.04	8.29E-07	3.63E-06
567	⁽¹⁾ PP	8.04	34.5	2.77E-04	1.21E-03	80.3	6.46E-04	2.83E-03	1.00	8.04E-06	3.52E-05	0.04	3.22E-07	1.41E-06
566	⁽¹⁾ PP	14.90	34.5	5.14E-04	2.25E-03	80.3	1.20E-03	5.24E-03	1.00	1.49E-05	6.53E-05	0.04	5.96E-07	2.61E-06
564	⁽²⁾ PC/ABS	114.67	34.5	3.96E-03	1.73E-02	199	2.28E-02	9.99E-02	1.00	1.15E-04	5.02E-04	0.04	4.59E-06	2.01E-05
1013	⁽¹⁾ PP	61.22	34.5	2.11E-03	9.25E-03	80.3	4.92E-03	2.15E-02	1.00	6.12E-05	2.68E-04	0.04	2.45E-06	1.07E-05
2035	⁽²⁾ ABS	59.16	34.5	2.04E-03	8.94E-03	199	1.18E-02	5.16E-02	1.00	5.92E-05	2.59E-04	0.04	2.37E-06	1.04E-05
2099	⁽²⁾ ABS	12.49	34.5	4.31E-04	1.89E-03	199	2.49E-03	1.09E-02	1.00	1.25E-05	5.47E-05	0.04	5.00E-07	2.19E-06
1372	⁽¹⁾ PP	56.80	34.5	1.96E-03	8.58E-03	80.3	4.66E-03	2.00E-02	1.00	5.68E-05	2.49E-04	0.04	2.27E-06	9.95E-06
2515	ABS	36.00	34.5	1.24E-03	5.44E-03	80.3	2.89E-03	1.27E-02	1.00	3.60E-05	1.58E-04	0.04	1.44E-06	6.31E-06
2282	⁽¹⁾ PP	59.56	34.5	2.05E-03	9.00E-03	80.3	4.78E-03	2.09E-02	1.00	5.96E-05	2.61E-04	0.04	2.38E-06	1.04E-05
668	⁽¹⁾ PP	41.50	34.5	1.43E-03	6.27E-03	80.3	3.33E-03	1.46E-02	1.00	4.15E-05	1.82E-04	0.04	1.66E-06	7.27E-06
2348	⁽¹⁾ PP	77.19	34.5	2.66E-03	1.17E-02	80.3	6.20E-03	2.71E-02	1.00	7.72E-05	3.38E-04	0.04	3.09E-06	1.35E-05
2514	PP	116.00	34.5	4.00E-03	1.75E-02	80.3	9.31E-03	4.08E-02	1.00	1.16E-04	5.08E-04	0.04	4.64E-06	2.03E-05
2513	PP	116.00	34.5	4.00E-03	1.75E-02	80.3	9.31E-03	4.08E-02	1.00	1.16E-04	5.08E-04	0.04	4.64E-06	2.03E-05
2518	PP	16.50	34.5	5.69E-04	2.49E-03	80.3	1.32E-03	5.80E-03	1.00	1.65E-05	7.23E-05	0.04	6.60E-07	2.89E-06
2511	ABS	4.90	34.5	1.69E-04	7.40E-04	80.3	3.93E-04	1.72E-03	1.00	4.90E-06	2.15E-05	0.04	1.96E-07	8.58E-07
2512	ABS	25.00	34.5	8.63E-04	3.78E-03	80.3	2.01E-03	8.79E-03	1.00	2.50E-05	1.10E-04	0.04	1.03E-06	4.38E-06
Totals		2,082.61		0.07	0.31		0.22	0.95		2.08E-03	9.12E-03		8.33E-05	3.65E-04
Revision		392.00		1.35E-02	5.92E-02		0.05	0.23		3.92E-04	1.72E-03		1.57E-05	6.87E-05

MethodologyEmissions (lbs/hr) = Max Throughput Rate (lbs resin/hr) * Emission Factor (lbs/10⁶ lbs) / 1000000

Emissions (tons/yr) = Emissions (lbs/hr) * 8760 (hrs/yr) / 2000 (lbs/ton)

Notes

These resin type and maximum throughput were submitted by the source.

The emission factors above were taken from technical papers described below in notes 1 through 6. This methodology and the emission factors were used in Registration No. 005-28577-00102, issued on January 21, 2010.

⁽¹⁾The emission factors for PM & VOC from Polypropylene molding were taken from a technical paper, volume 49, published in January 1999, by the Journal of Air and Waste Management Association titled "Development of Emission Factors for Polypropylene Processing". A melt temperature of 505 °F and reactor impact copolymer was used from Table 5. The emission factors for PP were used for the PE resins.⁽²⁾The polypropylene emission factor for PM was used for ABS and PC/ABS Resins. The emission factor for VOC emissions for ABS and PC/ABS Resins comes from the technical paper, "Sampling and Analysis of Volatile Organic Compounds Evolved During Thermal Processing of Acrylonitrile Butadiene Styrene Composite Resins", from volume 45, published in September 1995 of the Journal of Air and Waste Management Association. The Auto VOC emission factor from Table 4 was used.⁽³⁾The emission factors for PM & VOC from Polypropylene molding were taken from a technical paper, volume 49 in January 1999, published by the Journal of Air and Waste Management Association titled "Development of Emission Factors for Polypropylene Processing". A melt temperature of 505 °F and reactor impact copolymer was used from Table 5.⁽⁴⁾Emission factors for PM and VOC from polyamide processing were taken from the technical paper, "Development of Emission Factors for Polyamide Processing", from Volume 51, published in July 2001 of the Journal of Air and Waste Management Association. General PA6 Low Caprolactam was used from Table 3.⁽⁵⁾Emission factors for CO and NO_x from polyamide processing were taken from the technical paper, "Development of Emission Factors for Polyamide Processing", from Volume 51, published in July 2001 of the Journal of Air and Waste Management Association. General PA6 Low Caprolactam was used from Table 3. These emission factors were used for all resin types.⁽⁶⁾These are new injection molding machines where the maximum throughput rate is unknown. In order to be conservative, a maximum throughput rate of 115 pounds of resin per hour with ABS as the resin was used to calculate the worst case PTE.

**Appendix A: Emissions Calculations
Potential to Emit Hazardous Air Pollutants (HAPs) from the Injection Molding Machines**

Company Name: Mitchell Plastics
Address City IN Zip: 301 Pike Street
Charlestown, Indiana 47111
Operation Permit Number: F019-30695-00103
AA Permit Number: F019-34555-00103
Reviewer: Brandon Miller

HAP Emission Factors from Processing Polypropylene

HAP Constituent	CAS #	⁽¹⁾ Emission Factor (lbs/10 ⁶ lbs)
Acetaldehyde	75-07-0	0.20
Acrolein	107-02-8	0.01
Formaldehyde	50-00-0	0.18
Propionaldehyde	123-38-6	0.95
Acrylic acid	79-10-7	0.08

HAP Emission Factors from Processing ABS

HAP Constituent	CAS #	⁽²⁾ Emission Factor (lbs/10 ⁶ lbs)
Styrene	100-42-5	130
1,3-butadiene	106-99-0	0.93
Acrylonitrile	107-13-1	5.74
Ethylbenzene	100-41-4	27.6
Acetophenone	98-86-2	2.78

HAP Emission Factors from Processing Nylon

HAP Constituent	CAS #	⁽²⁾ Emission Factor (lbs/10 ⁶ lbs)
Styrene	100-42-5	0.01

Dorel Machine #	Resin Type	Max Throughput Rate (lbs resin/hr)	Acetaldehyde Emissions (tons/yr)	Acrolein Emissions (tons/yr)	Formaldehyde Emissions (tons/yr)	Propionaldehyde Emissions (tons/yr)	Acrylic acid Emissions (tons/yr)	Styrene Emissions (tons/yr)	1,3-butadiene Emissions (tons/yr)	Acrylonitrile Emissions (tons/yr)	Ethylbenzene Emissions (tons/yr)	Acetophenone Emissions (tons/yr)
562	⁽³⁾ PPOM	9.76	8.55E-06	4.27E-07	7.69E-06	4.06E-05	3.42E-06	NA	NA	NA	NA	NA
959	⁽¹⁾ PP	8.77	7.68E-06	3.84E-07	6.91E-06	3.65E-05	3.07E-06	NA	NA	NA	NA	NA
561	⁽¹⁾ PP	1.98	1.73E-06	8.67E-08	1.56E-06	8.24E-06	6.94E-07	NA	NA	NA	NA	NA
1151	⁽¹⁾ PP	4.44	3.89E-06	1.94E-07	3.50E-06	1.85E-05	1.56E-06	NA	NA	NA	NA	NA
563	⁽¹⁾ PP	13.73	1.20E-05	6.01E-07	1.08E-05	5.71E-05	4.81E-06	NA	NA	NA	NA	NA
2277	⁽¹⁾ PP	115.00	1.01E-04	5.04E-06	9.07E-05	4.79E-04	4.03E-05	NA	NA	NA	NA	NA
2245	⁽²⁾ ABS	3.74	NA	NA	NA	NA	NA	2.13E-03	1.52E-05	9.40E-05	4.52E-04	4.55E-05
578	⁽³⁾ PPOM	9.23	8.09E-06	4.04E-07	7.28E-06	3.84E-05	3.23E-06	NA	NA	NA	NA	NA
2006	⁽⁴⁾ PA6/GF30	10.89	NA	NA	NA	NA	NA	4.77E-07	NA	NA	NA	NA
576	⁽²⁾ ABS	13.58	NA	NA	NA	NA	NA	7.73E-03	5.53E-05	3.41E-04	1.64E-03	1.65E-04
1007	⁽¹⁾ PP	5.45	4.77E-06	2.39E-07	4.30E-06	2.27E-05	1.91E-06	NA	NA	NA	NA	NA
2242	⁽¹⁾ PP/GF10	4.05	3.55E-06	1.77E-07	3.19E-06	1.69E-05	1.42E-06	NA	NA	NA	NA	NA
2244	⁽¹⁾ PP/GF10	59.40	5.20E-05	2.60E-06	4.68E-05	2.47E-04	2.08E-05	NA	NA	NA	NA	NA
288	⁽³⁾ PPOM	29.85	2.61E-05	1.31E-06	2.35E-05	1.24E-04	1.05E-05	NA	NA	NA	NA	NA
573	⁽²⁾ ABS	11.87	NA	NA	NA	NA	NA	6.76E-03	4.84E-05	2.98E-04	1.43E-03	1.45E-04
962	⁽⁴⁾ PA6/GF30	16.16	NA	NA	NA	NA	NA	7.08E-07	NA	NA	NA	NA
1029	⁽¹⁾ PP	24.09	2.11E-05	1.06E-06	1.90E-05	1.00E-04	8.44E-06	NA	NA	NA	NA	NA
1030	⁽¹⁾ PP	21.96	1.92E-05	9.62E-07	1.73E-05	9.14E-05	7.69E-06	NA	NA	NA	NA	NA
1200	⁽¹⁾ PP	17.09	1.50E-05	7.49E-07	1.35E-05	7.11E-05	5.99E-06	NA	NA	NA	NA	NA
2511	⁽¹⁾ PP	4.90	4.29E-06	2.15E-07	3.86E-06	2.04E-05	1.72E-06	NA	NA	NA	NA	NA
2512	⁽¹⁾ PP	25.00	2.19E-05	1.10E-06	1.97E-05	1.04E-04	8.76E-06	NA	NA	NA	NA	NA
572	⁽²⁾ ABS	24.51	NA	NA	NA	NA	NA	1.40E-02	9.98E-05	6.16E-04	2.96E-03	2.98E-04
570	⁽²⁾ PBT	14.27	1.25E-05	6.25E-07	1.13E-05	5.94E-05	5.00E-06	NA	NA	NA	NA	NA
3057	⁽²⁾ ABS	182.00	NA	NA	NA	NA	NA	1.04E-01	7.41E-04	4.58E-03	2.20E-02	2.22E-03
4507	⁽¹⁾ PP	150.00	1.31E-04	6.57E-06	1.18E-04	6.24E-04	5.26E-05	NA	NA	NA	NA	NA
8607	⁽¹⁾ PP	60.00	5.26E-05	2.63E-06	4.73E-05	2.50E-04	2.10E-05	NA	NA	NA	NA	NA
2517	⁽¹⁾ PP	88.00	7.71E-05	3.85E-06	6.94E-05	3.66E-04	3.08E-05	NA	NA	NA	NA	NA
272	⁽¹⁾ PP	17.65	1.55E-05	7.73E-07	1.39E-05	7.34E-05	6.18E-06	NA	NA	NA	NA	NA
1196	⁽¹⁾ PP	20.96	1.84E-05	9.18E-07	1.65E-05	8.72E-05	7.34E-06	NA	NA	NA	NA	NA
1195	⁽¹⁾ PP	27.21	2.38E-05	1.19E-06	2.15E-05	1.13E-04	9.53E-06	NA	NA	NA	NA	NA
569	⁽¹⁾ PP	29.29	2.57E-05	1.28E-06	2.31E-05	1.22E-04	1.03E-05	NA	NA	NA	NA	NA
2518	⁽¹⁾ PP	16.50	1.45E-05	7.23E-07	1.30E-05	6.87E-05	5.78E-06	NA	NA	NA	NA	NA
2278	⁽¹⁾ PP	115.00	1.01E-04	5.04E-06	9.07E-05	4.79E-04	4.03E-05	NA	NA	NA	NA	NA
568	⁽¹⁾ PP	25.80	2.26E-05	1.13E-06	2.03E-05	1.07E-04	9.04E-06	NA	NA	NA	NA	NA
565	⁽¹⁾ PP	106.23	9.31E-05	4.65E-06	8.38E-05	4.42E-04	3.72E-05	NA	NA	NA	NA	NA
368	⁽¹⁾ PP	20.72	1.82E-05	9.08E-07	1.63E-05	8.62E-05	7.26E-06	NA	NA	NA	NA	NA
567	⁽¹⁾ PP	8.04	7.04E-06	3.52E-07	6.34E-06	3.35E-05	2.82E-06	NA	NA	NA	NA	NA
566	⁽¹⁾ PP	14.90	1.31E-05	6.53E-07	1.17E-05	6.20E-05	5.22E-06	NA	NA	NA	NA	NA
564	⁽²⁾ PC/ABS	114.67	NA	NA	NA	NA	NA	6.53E-02	4.67E-04	2.88E-03	1.39E-02	1.40E-03
1013	⁽¹⁾ PP	61.22	5.36E-05	2.68E-06	4.83E-05	2.55E-04	2.15E-05	NA	NA	NA	NA	NA
2035	⁽²⁾ ABS	115.00	NA	NA	NA	NA	NA	6.55E-02	4.68E-04	2.89E-03	1.39E-02	1.40E-03
2513	⁽¹⁾ PP	116.00	1.02E-04	5.08E-06	9.15E-05	4.83E-04	4.06E-05	6.61E-02	4.73E-04	2.92E-03	1.40E-02	1.41E-03
2514	⁽¹⁾ PP	116.00	1.02E-04	5.08E-06	9.15E-05	4.83E-04	4.06E-05	6.61E-02	4.73E-04	2.92E-03	1.40E-02	1.41E-03
2515	⁽¹⁾ PP	116.00	1.02E-04	5.08E-06	9.15E-05	4.83E-04	4.06E-05	6.61E-02	4.73E-04	2.92E-03	1.40E-02	1.41E-03
2099	⁽²⁾ ABS	12.49	NA	NA	NA	NA	NA	7.11E-03	5.09E-05	3.14E-04	1.51E-03	1.52E-04
1372	⁽¹⁾ PP	56.80	4.98E-05	2.49E-06	4.48E-05	2.36E-04	1.99E-05	NA	NA	NA	NA	NA
2282	⁽¹⁾ PP	59.56	5.22E-05	2.61E-06	4.70E-05	2.48E-04	2.09E-05	NA	NA	NA	NA	NA
668	⁽¹⁾ PP	41.50	3.64E-05	1.82E-06	3.27E-05	1.73E-04	1.45E-05	NA	NA	NA	NA	NA
2348	⁽¹⁾ PP	77.19	6.76E-05	3.38E-06	6.09E-05	3.21E-04	2.70E-05	NA	NA	NA	NA	NA
⁽⁶⁾ 1585	PE	338.11	2.96E-04	1.48E-05	2.67E-04	1.41E-03	1.18E-04	NA	NA	NA	NA	NA
⁽⁶⁾ 1584	PE	338.11	2.96E-04	1.48E-05	2.67E-04	1.41E-03	1.18E-04	NA	NA	NA	NA	NA
⁽⁶⁾ 1588	PE	338.11	2.96E-04	1.48E-05	2.67E-04	1.41E-03	1.18E-04	NA	NA	NA	NA	NA
Totals			0.002	1.19E-04	0.002	0.011	0.001	0.470	0.003	0.021	0.100	0.010
Total Combined HAPs			0.6212									
Revision			0.0002	9.20E-06	0.0002	0.0009	0.0001	0.1036	0.0007	0.0046	0.0220	0.0022
Total Revision Combined HAPs			0.1345									

Methodology
HAPs Emissions (tons/yr) = (Max Throughput Rate (lbs resin/hr) * Emission Factor (lbs/106 lbs) / 1000000) * 8760 (hrs/yr) / 2000 (lbs/ton)

Notes

These resin type and maximum throughput were submitted by the source.

The emission factors above were taken from technical papers described below in notes 1 through 5. This methodology and the emission factors were used in Registration No. 005-28577-00102, issued on January 21, 2010.

⁽¹⁾ Emission factors for HAPs from Polypropylene molding were taken from a technical paper, volume 49, published in January 1999, by the Journal of Air and Waste Management Association titled "Development of Emission Factors for Polypropylene Processing". A melt temperature of 505 °F and reactor impact copolymer was used from Table 5. The emission factors for PP were used for the PE resins.

⁽²⁾ Emission factors for HAPs from ABS and PC/ABS Resins were taken from the technical paper, "Sampling and Analysis of Volatile Organic Compounds Evolved During Thermal Processing of Acrylonitrile Butadiene Styrene Composite Resins" from Volume 45, published in September 1995 of the Journal of Air and Waste Management Association. The Auto HAPs emission factors from Table 4 was used.

⁽³⁾ The emission factors for HAPs from Polypropylene molding were taken from a technical paper, volume 49 in January 1999, published by the Journal of Air and Waste Management Association titled "Development of Emission Factors for Polypropylene Processing". A melt temperature of 505 and reactor impact copolymer was used from Table 5.

⁽⁴⁾ Emission factors for HAPs from polyamide processing were taken from the technical paper, "Development of Emission Factors for Polyamide Processing", from Volume 51, published in July 2001 of the Journal of Air and Waste Management Association. General PA6 Low Caprolactam was used from Table 3.

⁽⁵⁾ These are new injection molding machines where the maximum throughput rate is unknown. In order to be conservative, a maximum throughput rate of 115 po of resin per hour with ABS as the resin was used to calculate the worse case PTE.

⁽⁶⁾ These are extrusion X-Stamp machines.

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads**

Company Name: Mitchell Plastics
Address City IN Zip: 301 Pike Street
 Charlestown, Indiana 47111
Operation Permit Number: F019-30695-00103
AA Permit Number: F019-34555-00103
Reviewer: Brandon Miller

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (12/2003).

¹Vehicle Information (conservative assumptions by IDEM)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Passenger Vehicles entering plants	220.0	1.0	220.0	2.5	550.0	800	0.152	33.3	12166.7
Passenger Vehicle leaving plants	220.0	1.0	220.0	2.5	550.0	800	0.152	33.3	12166.7
Truck entering plants	20.0	1.0	20.0	16.0	320.0	200	0.038	0.8	276.5
Truck leaving plants	20.0	1.0	20.0	25.0	500.0	200	0.038	0.8	276.5
Total			480.0		1,920.0			68.2	24886.4

Note 1: The source did not provide vehicle information for the registration. Therefore, IDEM made conservative assumptions for passenger vehicles and trucks to estimate the PTE particulate from roads.

Average Vehicle Weight Per Trip = tons/trip
 Average Miles Per Trip = miles/trip

Unmitigated Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1.3 (01/2011))

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	4.0	4.0	4.0	tons = average vehicle weight (provided by source)
sL =	0.6	0.6	0.6	g/m ² = Ubiquitous Baseline Silt Loading Values of paved roads (Table 13.2.1-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E * [1 - (p/4N)]$

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
 where p = days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
 N = days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	0.03	0.01	0.00	lb/mile
Mitigated Emission Factor, $E_{ext} =$	0.03	0.01	0.00	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Passenger Vehicles entering plants	0.17	0.03	0.01	0.16	0.03	0.01
Passenger Vehicle leaving plants	0.17	0.03	0.01	0.16	0.03	0.01
Truck entering plants	0.00	0.00	0.00	0.00	0.00	0.00
Truck leaving plants	0.00	0.00	0.00	0.00	0.00	0.00
	0.35	0.07	0.02	0.32	0.06	0.02

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
 Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particle Matter (<2.5 um)
 PTE = Potential to Emit



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Pami Egan
Mitchell Plastics
301 Pike Street
Charlestown, IN 47111

DATE: August 1, 2014

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

SUBJECT: Final Decision
Significant Revision
019-34555-00103

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:
Rick Cartuyvelles – General Manager
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



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

August 1, 2014

TO: Charlestown Clark County Public Library

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

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

Applicant Name: Mitchell Plastics
Permit Number: 019-34555-00103

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

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

Enclosures
Final Library.dot 6/13/2013

Mail Code 61-53

IDEM Staff	GHOTOPP 8/1/2014 Mitchell Plastics 019-34555-00103 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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1		Pami Egan Mitchell Plastics 301 Pike Street Charlestown IN 47111 (Source CAATS) via confirmed delivery										
2		Rick Cartuyvelles General Manager Mitchell Plastics 301 Pike Street Charlestown IN 47111 (RO CAATS)										
3		Ms. Rhonda England 17213 Persimmon Run Rd Borden IN 47106-8604 (Affected Party)										
4		Charlestown Clark Co public Library 51 Clark Rd Charlestown IN 47111-1997 (Library)										
5		Ms. Betty Hislip 602 Dartmouth Drive, Apt 8 Clarksville IN 47129 (Affected Party)										
6		Charlestown City Council and Mayors Office 304 Main Cross Street Charlestown IN 47111-1230 (Local Official)										
7		H & H Metal Products 104 Industrial Way Chalestown In 47111 (Affected Party)										
8		Mr. Paul Grayson Superior Vault Co, Inc 500 Pike St Charlestown IN 47111 (Affected Party)										
9		Mr. Steve Spies Rhodes, Inc 100 Quality Ct Charlestown IN 47111 (Affected Party)										
10		Clark County Board of Commissioners 501 E. Court Avenue Jeffersonville IN 47130 (Local Official)										
11		Clark County Health Department 1320 Duncan Avenue Jeffersonville IN 47130-3723 (Health Department)										
12		R & R Donnelly 100 Quality Court Charlestown IN 47111 (Affected Party)										
13		Big G Supply 600 Pike Street Charlestown IN 47111 (Affected Party)										
14		Allens Heat & Air 300 Pike Street Charlestown IN 47111 (Affected Party)										
15												

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