



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: July 2, 2014

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

Source Name: D & W Fine Pack, LLC

Permit Level: Administrative Amendment

Permit Number: 003-34606-00346

Source Location: 7707 Vicksburg Pike, Fort Wayne, Indiana

Type of Action Taken: Changes that are administrative in nature

Notice of Decision: Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

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 34606.

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

(continues on next page)

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

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

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

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

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



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Mr. Phil Marshall
D & W Fine Pack LLC
7707 Vicksburg Pike
Fort Wayne, IN 46804

July 2, 2014

Re: 003-34606-00346
Administrative Amendment to
M003-31054-00346

Dear Mr. Marshall:

D & W Fine Pack LLC was issued a Minor Source Operating Permit (MSOP) Renewal No. M003-31054-00346 on September 26, 2012 for a stationary molded plastic packaging plant located at 7,707 Vicksburg Pike, Fort Wayne, Indiana. On June 4, 2014, the Office of Air Quality (OAQ) received an application from the source requesting to add the following new emission units:

- (a) One (1) plastic thermoformer, identified as #31, with a maximum capacity of 1,000 lbs/hr., located indoors, uncontrolled, exhausting within the building.

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

The total potential to emit from the thermoformer is based on the throughput of the extruders because it is the bottleneck in the process. The throughput of the extruders is not increasing as a result of this addition. However, there are little emissions in the total potential to emit of this source as a result of this change. (See Appendix A for emission calculations).

- (b) One (1) flaker (cutter), identified as #43, with a maximum capacity of 400 lbs/hr., located indoors, uncontrolled, exhausting within the building.

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

The total potential to emit for the flaker (cutter) is based on the throughput of the extruders because it is the bottleneck in the process. The throughput of the extruders is not increasing as a result of this addition. Therefore, there are no changes in the potential to emit of the source as a result of this change. (See Appendix A for emission calculations).

The PTE of the emission unit is as follows:



A State that Works

Process/ Emission Unit	PTE of Proposed Modification (tons/year)									
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Thermoformer #31	0.151	0.151	0.151	-	-	0.78	-	-	0.057	0.02 Styrene
Flaker (cutter) #43	0.31	0.18	0.18	-	-	0.33	-	-	-	-
Total PTE of Proposed Modification	0.461	0.331	0.331	-	-	1.11	-	-	0.057	0.02 Styrene

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) or National Emission standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in this administrative amendment.
- (b) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) Pursuant to 326 IAC 6-3-1(b)(14), the new thermoformer and flaker (cutter) are exempt from the requirements of 326 IAC 6-3-2 because the potential to emit particulate from each thermoformer and flaker (cutter) is less than 0.551 pounds per hour.
- (c) 326 IAC 8 (Volatile Organic Compound Rules) The potential VOC emissions from each new thermoformer and flaker (cutter) is less than 15 pounds per day. Therefore, pursuant to 326 IAC 8-1-1(b), the requirements of 326 IAC 8 (Volatile Organic Compound Rules) do not apply to the thermoformer and flaker (cutter).
- (d) No other state rules are applicable to this source due to the addition of these new thermoformer and flaker (cutter).

PTE of the Entire Source to accommodate the MSOP Administrative Amendment

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

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the MSOP Administrative Amendment (tons/year)									
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Silo Loading	35.67	35.67	35.67	-	-	-	-	-	-	-
Extruder Loading	35.67	35.67	35.67	-	-	-	-	-	-	-
Extruders	3.08	3.08	3.08	-	-	15.79	-	-	9.36	8.79 Styrene
Anti-fog Lines	-	-	-	-	-	0.62	-	-	-	-
Thermoformers	3.058	3.058	3.058	-	-	15.6679	-	-	1.145	0.50 Styrene
Flakers (Cutters)	2.43	1.39	1.39	-	-	11.52	-	-	-	-
UV Printers	-	-	-	-	-	0.20	-	-	-	-
Small Boilers	0.46	1.83	1.83	0.14	24.12	1.33	20.26	29,114	0.46	0.43 Hexane

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the MSOP Administrative Amendment (tons/year)									
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Paved Roads	2.95	0.59	0.14	-	-	-	-	-	-	-
Total PTE of Entire Source	83.34 83.34	81.28 81.31	80.84 80.86	0.14	24.12	45.42 45.24	20.26	29,114	10.967 10.967	9.29 Styrene
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA

*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
 **The 100,000 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.

Note: The above PTE table before changes is from Appendix A of 003 - 34083 - 00346, issued on February 13, 2014.

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 MSOP 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 After Issuance of MSOP Administrative Amendment (tons/year)									
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Silo Loading	35.67	35.67	35.67	-	-	-	-	-	-	-
Extruder Loading	35.67	35.67	35.67	-	-	-	-	-	-	-
Extruders	3.08	3.08	3.08	-	-	15.79	-	-	9.36	8.79 Styrene
Anti-fog Lines	-	-	-	-	-	0.62	-	-	-	-
Thermoformers	3.08	3.08	3.08	-	-	15.79	-	-	1.15	0.50 Styrene
Flakers (Cutters)	2.43	1.39	1.39	-	-	11.52	-	-	-	-
UV Printers	-	-	-	-	-	0.20	-	-	-	-
Small Boilers	0.46	1.83	1.83	0.14	24.12	1.33	20.26	29,114	0.46	0.43 Hexane
Paved Roads	2.95	0.59	0.14	-	-	-	-	-	-	-
Total PTE of Entire Source	83.34	81.31	80.86	0.14	24.12	45.24	20.26	29,114	10.97	9.29 Styrene

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP Administrative Amendment (tons/year)									
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA

*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
 **The 100,000 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.

Pursuant to the provisions of 326 IAC 2-6.1-6, the permit is amended as follows:

- (1) Section A.2(d) has been revised to include the new thermoformer #31.
- (2) Section A.2(e) has been revised to include the new flaker (cutter) #43.
- (3) IDEM, OAQ made additional revisions to the permit as described below:
 - (a) A note of the total bottleneck throughput of all the extruder was added to Section A.2(c).
 - (b) The thermoformer #30 has been revised from approved for construction in 2014 to constructed in 2014 in Section A.2(d)(10).
 - (c) A note of the total bottleneck throughput of all flakers (cutters), was added to Section A.2(e).
 - (d) The flaker (cutter) #42 has been revised from approved for construction in 2014 to constructed in 2014 in Section A.2(e)(21).

Pursuant to the provisions of 326 IAC 2-6.1-6, the permit is hereby amended as follows with the deleted language as ~~strikeouts~~ and new language **bolded**.

A.2 Emission Units and Pollution Control Equipment Summary

....

- (c) Fifteen (15) plastic extruders, which are considered as bottleneck to the plant, located indoors, these units consist of:
 - (13) One (1) pelletizing unit, identified as #15, with a maximum capacity of 1500 lbs/hr, with a baghouse filtration system, exhausting within the building (indirectly exhausting to stack EF-AG-9), and installed in 2006.

Note: The total bottleneck throughput of all the extruder is 20,360 lbs/hr of resin pellets. Extruders 1 to 10 process raw resin pellets from 36 outdoor silos, Extruders 11 to 15 process ground resin pellets from 20 indoor silos.

- (d) ~~Twenty-nine (29)~~ **Thirty (30)** plastic thermoformers, located indoors, and exhausting within the building. These units consist of:

.....

-
- (10) One (1) unit, identified as #30, with a maximum capacity of 1000 lbs/hr and approved for construction in 2014.
 - (11) **One (1) unit, identified as #31, with a maximum capacity of 1000 lbs/hr., and approved in 2014 for construction.**

.....

(e) ~~Forty-two (42)~~ **Forty-three (43)** flakers (cutters), located indoors, uncontrolled, and exhausting within the building, **with a maximum capacity of 15.6% scrap of 20,360 lbs/hr (which is the total bottleneck throughput of all the extruders)**. These units consist of:

-
- (21) One (1) unit, identified as #42, with a maximum capacity of 150 lbs/hr and approved for construction in 2014.
 - (22) **One (1) unit, identified as #43, with a maximum capacity of 400 lbs/hr., and approved in 2014 for construction.**

.....

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

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM 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 Ms. Renee Traivaranon, of my staff, at 317-234-5615 or 1-800-451-6027, and ask for extension 4-5615.

Sincerely,



Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit and Appendix A
CT/rt

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



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Michael R. Pence
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**Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY**

**D & W Fine Pack LLC
7707 Vicksburg Pike
Fort Wayne, Indiana 46804**

(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.

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

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

Operation Permit No. M003-31054-00346	
Issued by: Original Signed By Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 26, 2012 Expiration Date: September 26, 2022

First Administrative Amendment No. 003-32515-00346, issued December 3, 2012
Second Administrative Amendment No. 003-34083-00346, issued on February 13, 2014

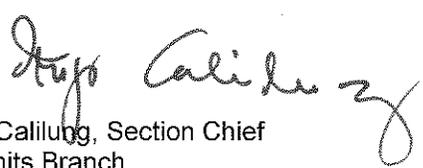
Third Administrative Amendment No. 003-34606-00346	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 2, 2014 Expiration Date: September 26, 2022

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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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary molded plastic packaging plant.

Source Address:	7707 Vicksburg Pike, Fort Wayne, Indiana 46804
General Source Phone Number:	260-459-9785
SIC Code:	3089 (Plastic Products, Not Elsewhere Classified)
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source 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

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

- (a) Resin pellets are loaded into thirty-six (36) granular polystyrene storage silos, located outdoors, each with a capacity of 4,025 cubic feet, consisting of:
- (1) Three (3) pellet silos, identified as #1, #8, and #9, installed in 1990, with a maximum capacity of 399 pounds per hour. Silos #1 and #8 exhaust to a mesh vent and silo number 9 has a baghouse filter for particulate control;
 - (2) Six (6) partitioned pellet silos, identified as #2, #3, #4, #5, #6, and #7, installed in 1990, with a maximum capacity of 399 pounds per hour and exhausting to mesh vents;
 - (3) Six (6) pellet silos, identified as #10, #11, #12, #13, #14, and #15, installed in 1995, with a maximum capacity of 399 pounds per hour and exhausting to mesh vents;
 - (4) Twelve (12) pellet silos, identified as #16, #17, #18, #19, #20, #21, #22, #23, #24, #25, #26, and #27, installed in 2002, with a maximum capacity of 399 pounds per hour and exhausting to mesh vents; and
 - (5) Nine (9) pellet silos, identified as #28, #29, #30, #31, #32, #33, #34, #35, and #36, installed in 2005, with a maximum capacity of 399 pounds per hour and exhausting to mesh vents.

Note: This facility uses several fully enclosed pneumatic conveyance systems for the transport and handling of plastic resin pellets. The plastic resin pellets are delivered to the facility by railcar, semi truck or bulk box delivery, and they are pneumatically conveyed to thirty-six (36) fully enclosed plastic storage silos. The resin pellets are then pneumatically conveyed to the extruders to be made into

sheets which are stored as rolls. The extruded sheets and molds are used for the thermoforming operation. After passing through the thermoformers, the 'skeleton' or scrap materials are granulated and pneumatically conveyed to the scrap regrind area where the scrap is pelletized and sent back to the extruder operation for reuse.

- (b) Twenty (20) granular polystyrene storage silos, located indoors, each with a capacity of 516 cubic feet, consisting of:
 - (1) Seven (7) flake silo units, identified as A, B, C, D, E, F, and G were installed in 1990, with a maximum capacity of 300 pounds per hour. Four of these flake silo units (A, C, E, and G) have a baghouse filter for particulate control, three have mesh vents;
 - (2) Five (5) units, identified as H, I, J, K, and L, were installed in 2002, with a maximum capacity of 300 pounds per hour. Four of these flake silo units (I, J, K, and L) have a baghouse filter for particulate control, one flake silo unit has a mesh vent;
 - (3) Eight (8) units, identified as M, N, O, P, Q, R, S, and T, were installed in 2006, with a maximum capacity of 300 pounds per hour. All of these flake silo units have a baghouse filter for particulate control.

- (c) Fifteen (15) plastic extruders, which are considered as bottleneck to the plant, located indoors, these units consist of:
 - (1) One (1) co-extruder unit, identified as extruder #1, with a maximum capacity of 1200 lbs/hr, with seventy percent of material processed through a baghouse filtration system, exhausting to stack EF-C-3, and installed in 1990;
 - (2) One (1) mono layer unit, identified as extruder #2, with a maximum capacity of 1080 lbs/hr, exhausting to stack EF-E-2, and installed in 1990;
 - (3) One (1) co-extruder unit, identified as extruder #3, with a maximum capacity of 2000 lbs/hr, with seventy percent of material processed through a baghouse filtration system, exhausting to stack EF-F-2, and installed in 1995;
 - (4) Two (2) co-extruder units, identified as extruders #4 and #5, each with a maximum capacity of 1750 lbs/hr, with a vacuum system and singed polyester fiber filters, exhausting to stack EF-Q-5, and installed in 2002;
 - (5) One (1) tandem unit, identified as extruder #6, with a maximum capacity of 900 lbs/hr, with a vacuum system and a singed polyester fiber filter, exhausting within the building (indirectly exhausting to stack EF-U-5), and installed in 2002;
 - (6) One (1) mono layer unit, identified as extruder #7, with a maximum capacity of 1080 lbs/hr, with a vacuum system and a singed polyester fiber filter, exhausting within the building (indirectly exhausting to stack EF-AK-8), and installed in 2006;
 - (7) One (1) co-extruder unit, identified as #8, with a maximum capacity of 2000 lbs/hr, with a vacuum system and a singed polyester fiber filter, exhausting within the building (indirectly exhausting to stack EF-AM-9), and installed in 2006;
 - (8) Two (2) twin screw units, identified as #9 and #10, each with a maximum capacity of 1300 lbs/hr, with a baghouse filtration system, exhausting within the building (indirectly exhausting to stack EF-I-1), and installed in 2002;

- (9) One (1) pelletizing unit, identified as #11, with a maximum capacity of 1000 lbs/hr, with a prototype filter system, exhausting within the building (indirectly exhausting to stack EF-I-4), and installed in 1991;
- (10) One (1) pelletizing unit, identified as #12, with a maximum capacity of 1000 lbs/hr, with a prototype filter system, exhausting within the building (indirectly exhausting to stack EF-J-4), and installed in 1991;
- (11) One (1) pelletizing unit, identified as #13, with a maximum capacity of 1000 lbs/hr, exhausting within the building (indirectly exhausting to stack EF-J-5), installed in 2002;
- (12) One (1) pelletizing unit, identified as #14, with a maximum capacity of 1500 lbs/hr, with a baghouse filtration system, exhausting within the building (indirectly exhausting to stack EF-AG-8), and installed in 2006; and
- (13) One (1) pelletizing unit, identified as #15, with a maximum capacity of 1500 lbs/hr, with a baghouse filtration system, exhausting within the building (indirectly exhausting to stack EF-AG-9), and installed in 2006.

Note: The total bottleneck throughput of all the extruder is 20,360 lbs/hr of resin pellets. Extruders 1 to 10 process raw resin pellets from 36 outdoor silos, Extruders 11 to 15 process ground resin pellets from 20 indoor silos.

- (d) Thirty (30) plastic thermoformers, located indoors, and exhausting within the building. These units consist of:
- (1) Four (4) units, identified as #2, #4, #5, and #6, with a maximum capacity of 600 lbs/hr and installed in 1990;
 - (2) One (1) unit, identified as #3, with a maximum capacity of 600 lbs/hr and installed in 1993;
 - (3) Five (5) units, identified as #7, #8, #10 and #12, and #13, with a maximum capacity of 600 lbs/hr and installed in 1995;
 - (4) Three (3) units, identified as #9, #11 and #23, with a maximum capacity of 600 lbs/hr and installed in 2002;
 - (5) Six (6) units, identified as #14, #15, #16, #24, #25, and #26, with a maximum capacity of 600 lbs/hr and installed in 2005;
 - (6) One (1) unit, identified as #17, with a maximum capacity of 1000 lbs/hr and installed in 1995;
 - (7) Two (2) units, identified as #18 and #19, with a maximum capacity of 1000 lbs/hr and installed in 2002;
 - (8) Three (3) units, identified as #20 and #21, and #22, with a maximum capacity of 600 lbs/hr and installed in 2006.
 - (9) Three (3) units, identified as #27 and #28, and #29, each with a maximum capacity of 1000 lbs/hr and installed in 2012.

- (10) One (1) unit, identified as #30, with a maximum capacity of 1000 lbs/hr and constructed in 2014.
- (11) One (1) unit, identified as #31, with a maximum capacity of 1000 lbs/hr., and approved in 2014 for construction.
- (e) Forty-three (43) flakers (cutters), located indoors, uncontrolled, and exhausting within the building, with a maximum capacity of 15.6% scrap of 20,360 lbs/hr (which is the total bottleneck throughput of all the extruders). These units consist of:
 - (1) One (1) unit, identified as #1, with a maximum capacity of 30 lbs/hr and installed in 1994;
 - (2) One (1) unit, identified as #2, with a maximum capacity of 30 lbs/hr and installed in 1990;
 - (3) One (1) unit, identified as #3, with a maximum capacity of 50 lbs/hr and installed in 2006;
 - (4) Two (2) units, identified as #4 and #5, each with a maximum capacity of 50 lbs/hr and installed in 2002;
 - (5) One (1) unit, identified as #6, with a maximum capacity of 40 lbs/hr and installed in 2002;
 - (6) One (1) unit, identified as #7, with a maximum capacity of 35 lbs/hr and installed in 2005;
 - (7) One (1) unit, identified as #8, with a maximum capacity of 50 lbs/hr and installed in 2002;
 - (8) Three (3) units, identified as #9, #10, and #38, each with a maximum capacity of 150 lbs/hr and installed in 1990;
 - (9) Two (2) units, identified as #11 #12, with a maximum capacity of 150 lbs/hr and installed in 2005;
 - (10) Four (4) units, identified as #13, #15, #17, and #19, each with a maximum capacity of 70 lbs/hr and installed in 1990;
 - (11) Four (4) units, identified as #14, #18, #21, and #23, each with a maximum capacity of 70 lbs/hr and installed in 1994;
 - (12) One (1) unit, identified as #16, with a maximum capacity of 70 lbs/hr and installed in 1993;
 - (13) One (1) unit, identified as #20, with a maximum capacity of 70 lbs/hr and installed in 2000;
 - (14) Four (4) units, identified as #22, #29, #30 and #34, each with a maximum capacity of 70 lbs/hr and installed in 2001;
 - (15) Two (2) units, identified as #24 and #26, each with a maximum capacity of 70 lbs/hr and installed in 1995;

- (16) Three (3) units, identified as #25, #27, and #35, each with a maximum capacity of 70 lbs/hr and installed in 2005;
 - (17) One (1) unit, identified as #28, with a maximum capacity of 70 lbs/hr and installed in 2002;
 - (18) Three (3) units, identified as #31, #32, and #33, each with a maximum capacity of 70 lbs/hr and installed in 2006;
 - (19) Two (2) units, identified as #36 and #37, each with a maximum capacity of 70 lbs/hr and installed in 2004.
 - (20) Three (3) units, identified as #39, #40 and #41, each with a maximum capacity of 150 lbs/hr and installed in 2012.
 - (21) One (1) unit, identified as #42, with a maximum capacity of 150 lbs/hr and constructed in 2014.
 - (22) One (1) unit, identified as #43, with a maximum capacity of 400 lbs/hr., and approved in 2014 for construction.
- (f) Three (3) ultraviolet cure ink printers, with a combined maximum capacity of 45.66 pounds of ink per hour, uncontrolled, not venting to a stack, consisting of:
- (1) One (1) unit, identified as #1, installed in 1990; and
 - (2) Two (2) units, identified as #2 and #3, installed in 1995.
- (g) Miscellaneous activities consisting of the following:
- (1) Natural gas fired combustion units each with heat input capacities equal to or less than ten million (10,000,000) BTU per hour, with a combined heat input capacity of 56.2 MMBtu/hr, itemized as follows:
 - (i) Twenty (20) heater units, identified as #1-20, installed in 1992;
 - (ii) Sixteen (16) heater units, identified as #21-36, installed in 2001; and
 - (iii) Nine (9) heating units, identified as #37-45, installed in 2005.
 - (2) Anti-fog solution application unit, installed in 1996 with a maximum capacity of 1.19 pounds per hour.
 - (3) Two (2) Anti-fog solution application units, which apply a sugar based solution to the clear extruded sheet to reduce moisture build up when the product is used with hot food, installed in 2012, each with a maximum capacity of 0.54 pounds per hour.
 - (4) Paved roads.

SECTION B

GENERAL CONDITIONS

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

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 2-1.1-1) shall prevail.

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

- (a) This permit, M003-31054-00346, is issued for a fixed term of ten (10) 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

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

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

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

B.7 Duty to Provide Information

- (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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

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

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.The Permittee shall implement the PMPs.
- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

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

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M003-31054-00346 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.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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

B.12 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

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

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

B.14 Source Modification Requirement

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

**B.15 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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

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

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

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

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

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

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

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

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

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

B.18 Credible Evidence [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 2-6.1-5(a)(1)]

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

- (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

C.12 Response to Excursions or Exceedances

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) Fifteen (15) plastic extruders, which are considered as bottleneck to the plant, located indoors, these units consist of:
- (1) One (1) co-extruder unit, identified as extruder #1, with a maximum capacity of 1200 lbs/hr, with seventy percent of material processed through a baghouse filtration system, exhausting to stack EF-C-3, and installed in 1990;
 - (2) One (1) mono layer unit, identified as extruder #2, with a maximum capacity of 1080 lbs/hr, exhausting to stack EF-E-2, and installed in 1990;
 - (3) One (1) co-extruder unit, identified as extruder #3, with a maximum capacity of 2000 lbs/hr, with seventy percent of material processed through a baghouse filtration system, exhausting to stack EF-F-2, and installed in 1995;
 - (4) Two (2) co-extruder units, identified as extruders #4 and #5, each with a maximum capacity of 1750 lbs/hr, with a vacuum system and singed polyester fiber filters, exhausting to stack EF-Q-5, and installed in 2002;
 - (5) One (1) tandem unit, identified as extruder #6, with a maximum capacity of 900 lbs/hr, with a vacuum system and a singed polyester fiber filter, exhausting within the building (indirectly exhausting to stack EF-U-5), and installed in 2002;
 - (6) One (1) mono layer unit, identified as extruder #7, with a maximum capacity of 1080 lbs/hr, with a vacuum system and a singed polyester fiber filter, exhausting within the building (indirectly exhausting to stack EF-AK-8), and installed in 2006;
 - (7) One (1) co-extruder unit, identified as #8, with a maximum capacity of 2000 lbs/hr, with a vacuum system and a singed polyester fiber filter, exhausting within the building (indirectly exhausting to stack EF-AM-9), and installed in 2006;
 - (8) Two (2) twin screw units, identified as #9 and #10, each with a maximum capacity of 1300 lbs/hr, with a baghouse filtration system, exhausting within the building (indirectly exhausting to stack EF-I-1), and installed in 2002;
 - (9) One (1) pelletizing unit, identified as #11, with a maximum capacity of 1000 lbs/hr, with a prototype filter system, exhausting within the building (indirectly exhausting to stack EF-I-4), and installed in 1991;
 - (10) One (1) pelletizing unit, identified as #12, with a maximum capacity of 1000 lbs/hr, with a prototype filter system, exhausting within the building (indirectly exhausting to stack EF-J-4), and installed in 1991;
 - (11) One (1) pelletizing unit, identified as #13, with a maximum capacity of 1000 lbs/hr, exhausting within the building (indirectly exhausting to stack EF-J-5), installed in 2002;
 - (12) One (1) pelletizing unit, identified as #14, with a maximum capacity of 1500 lbs/hr, with a baghouse filtration system, exhausting within the building (indirectly exhausting to stack EF-AG-8), and installed in 2006; and

(13) One (1) pelletizing unit, identified as #15, with a maximum capacity of 1500 lbs/hr, with a baghouse filtration system, exhausting within the building (indirectly exhausting to stack EF-AG-9), and installed in 2006.

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

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

D.1.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from extruders 3, 4, 5, 8, 14, and 15 shall each be limited by the following:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Emission Unit	Process Weight Rate (tons/hr)	326 IAC 6-3-2 Allowable Particulate Emission Rate (lbs/hr)
Extruder 3	1.00	4.10
Extruder 4	0.88	3.75
Extruder 5	0.88	3.75
Extruder 8	1.00	4.10
Extruder 14	0.75	3.38
Extruder 15	0.75	3.38

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	D & W Fine Pack LLC
Address:	7707 Vicksburg Pike
City:	Fort Wayne, Indiana 46804
Phone #:	260-459-9785
MSOP #:	M003-31054-00346

I hereby certify that D & W Fine Pack LLC is:

still in operation.

no longer in operation.

I hereby certify that D & W Fine Pack LLC is:

in compliance with the requirements of MSOP M003-31054-00346.

not in compliance with the requirements of MSOP M003-31054-00346.

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

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

Noncompliance:

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

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

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Appendix A: Emissions Calculations
Emission Summary

Company Name: D & W Fine Pack LLC
Source Address: 7707 Vicksburg Pike, Fort Wayne IN 46804
Administrative Amendment: 003-34606-00346
Reviewer: Renee Traivaranon

Process Description	Uncontrolled Potential to Emit (PTE) (tons/year)										
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP	
Silo Loading	35.67	35.67	35.67	-	-	-	-	-	-	-	-
Extruder Loading	35.67	35.67	35.67	-	-	-	-	-	-	-	-
Extruders	3.08	3.08	3.08	-	-	15.79	-	-	9.36	8.79	styrene
Anti-fog Lines	-	-	-	-	-	0.62	-	-	-	-	-
Thermoformers	0.15	0.15	0.15	-	-	15.79	-	-	1.15	0.50	styrene
Flakers (Cutters)	1.39	1.39	0.00	-	-	-	-	-	-	-	-
UV Printers	-	-	-	-	-	0.20	-	-	-	-	-
Small Boilers	0.46	1.83	1.83	0.14	24.12	1.33	20.26	29,114	0.46	0.43	hexane
Paved Roads	2.95	0.59	0.14	-	-	-	-	-	-	-	-
Total PTE	79.37	78.38	76.55	0.14	24.12	33.73	20.26	29,114	10.97	9.29	styrene

Process Description	Controlled Potential to Emit (PTE) (tons/year)										
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP	
Silo Loading	26.61	26.61	26.61	-	-	-	-	-	-	-	-
Extruder Loading	4.39	4.39	4.39	-	-	-	-	-	-	-	-
Extruders	3.08	3.08	3.08	-	-	15.79	-	-	9.36	8.79	styrene
Anti-fog Lines	-	-	-	-	-	0.62	-	-	-	-	-
Thermoformers	0.15	0.15	0.15	-	-	15.79	-	-	1.15	0.50	styrene
Flakers (Cutters)	1.39	1.39	0.00	-	-	-	-	-	-	-	-
UV Printers	-	-	-	-	-	0.20	-	-	-	-	-
Small Boilers	0.46	1.83	1.83	0.14	24.12	1.33	20.26	29,114	0.46	0.43	hexane
Paved Roads	2.70	0.54	0.13	-	-	-	-	-	-	-	-
Total PTE	38.77	37.99	36.19	0.14	24.12	33.73	20.26	29114	10.97	9.29	styrene

**Appendix A: Emissions Calculations
Bottleneck Throughput of Resin Pellets**

Company Name: D & W Fine Pack LLC
Source Address: 7707 Vicksburg Pike, Fort Wayne IN 46804
Administrative Amendment: 003-34606-00346
Reviewer: Renee Traivaranon

Based on information provided by the source, the extruder process is the bottleneck in the molded plastic packaging plant. Extruders 1 through 10 process raw resin pellets from the 36 outdoor silos. Extruders 11 through 15 process ground resin pellets from the 20 indoor silos.

Extruder	Maximum Capacity (lbs/hr)
Extruder 1	1200
Extruder 2	1080
Extruder 3	2000
Extruder 4	1750
Extruder 5	1750
Extruder 6	900
Extruder 7	1080
Extruder 8	2000
Extruder 9	1300
Extruder 10	1300

Total Bottleneck Throughput (lbs/hr) 14360

Extruder	Maximum Capacity (lbs/hr)
Extruder 11	1000
Extruder 12	1000
Extruder 13	1000
Extruder 14	1500
Extruder 15	1500

Total Bottleneck Throughput (lbs/hr) 6000

Total Bottleneck Throughput for all Extruders (lbs/hr) 20360

**Appendix A: Emissions Calculations
PM Emissions
Loading of Resin Pellets to Silo Storage**

Company Name: D & W Fine Pack LLC
Source Address: 7707 Vicksburg Pike, Fort Wayne IN 46804
Administrative Amendment: 003-34606-00346
Reviewer: Renee Traivaranon

Loading of Resin Pellet Silos from Bulk Transport

Resin pellets are loaded through an enclosed system from bulk transport into the thirty-six (36) storage silos located outdoors, each with a capacity of 4,025 cubic feet.

Bottleneck Throughput of Resin Silos 1 through 36 (lbs/hr)	14360	(total of 36 silos)
Number of Silos	36	
Average Bottleneck Throughput of Each Resin Pellets Silo (lbs/hr)	399	(each silo)

Emission Unit	Average Bottleneck Throughput (lbs/hr)	*Emission Factor (lb/ton)	Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hr)**	Uncontrolled PTE of PM/PM10/PM2.5 (tons/yr)**	Control Efficiency (%)	Controlled PTE of PM/PM10/PM2.5 (tons/yr)**
Silo 1	399	0.80	0.16	0.70	-	0.699
Silo 2	399	0.80	0.16	0.70	-	0.699
Silo 3	399	0.80	0.16	0.70	-	0.699
Silo 4	399	0.80	0.16	0.70	-	0.699
Silo 5	399	0.80	0.16	0.70	-	0.699
Silo 6	399	0.80	0.16	0.70	-	0.699
Silo 7	399	0.80	0.16	0.70	-	0.699
Silo 8	399	0.80	0.16	0.70	-	0.699
Silo 9	399	0.80	0.16	0.70	99.50%	0.003
Silo 10	399	0.80	0.16	0.70	-	0.699
Silo 11	399	0.80	0.16	0.70	-	0.699
Silo 12	399	0.80	0.16	0.70	-	0.699
Silo 13	399	0.80	0.16	0.70	-	0.699
Silo 14	399	0.80	0.16	0.70	-	0.699
Silo 15	399	0.80	0.16	0.70	-	0.699
Silo 16	399	0.80	0.16	0.70	-	0.699
Silo 17	399	0.80	0.16	0.70	-	0.699
Silo 18	399	0.80	0.16	0.70	-	0.699
Silo 19	399	0.80	0.16	0.70	-	0.699
Silo 20	399	0.80	0.16	0.70	-	0.699
Silo 21	399	0.80	0.16	0.70	-	0.699
Silo 22	399	0.80	0.16	0.70	-	0.699
Silo 23	399	0.80	0.16	0.70	-	0.699
Silo 24	399	0.80	0.16	0.70	-	0.699
Silo 25	399	0.80	0.16	0.70	-	0.699
Silo 26	399	0.80	0.16	0.70	-	0.699
Silo 27	399	0.80	0.16	0.70	-	0.699
Silo 28	399	0.80	0.16	0.70	-	0.699
Silo 29	399	0.80	0.16	0.70	-	0.699
Silo 30	399	0.80	0.16	0.70	-	0.699
Silo 31	399	0.80	0.16	0.70	-	0.699
Silo 32	399	0.80	0.16	0.70	-	0.699
Silo 33	399	0.80	0.16	0.70	-	0.699
Silo 34	399	0.80	0.16	0.70	-	0.699
Silo 35	399	0.80	0.16	0.70	-	0.699
Silo 36	399	0.80	0.16	0.70	-	0.699
Totals				25.16		24.46

Loading of Resin Pellet Silos from Grinders

After grinding of the scrap plastic, the ground plastic is pneumatically conveyed to the twenty (20) storage silos located indoors, each with a capacity of 516 cubic feet.

Bottleneck Throughput of Resin Silos A through T (lbs/hr)	6000	(total of 20 silos)
Number of Silos	20	
Average Throughput of Each Resin Pellets Silo (lbs/hr)	300	(each silo)

Emission Unit	Average Throughput (lbs/hr)	*Emission Factor (lb/ton)	Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hr)**	Uncontrolled PTE of PM/PM10/PM2.5 (tons/yr)**	Control Efficiency (%)	Controlled PTE of PM/PM10/PM2.5 (tons/yr)**
Flake Silo A	300	0.80	0.12	0.53	99.50%	0.003
Flake Silo B	300	0.80	0.12	0.53	-	0.526
Flake Silo C	300	0.80	0.12	0.53	99.50%	0.003
Flake Silo D	300	0.80	0.12	0.53	-	0.526
Flake Silo E	300	0.80	0.12	0.53	99.50%	0.003
Flake Silo F	300	0.80	0.12	0.53	-	0.526
Flake Silo G	300	0.80	0.12	0.53	99.50%	0.003
Flake Silo H	300	0.80	0.12	0.53	-	0.526
Flake Silo I	300	0.80	0.12	0.53	99.50%	0.003
Flake Silo J	300	0.80	0.12	0.53	99.50%	0.003
Flake Silo K	300	0.80	0.12	0.53	99.50%	0.003
Flake Silo L	300	0.80	0.12	0.53	99.50%	0.003
Flake Silo M	300	0.80	0.12	0.53	99.50%	0.003
Flake Silo N	300	0.80	0.12	0.53	99.50%	0.003
Flake Silo O	300	0.80	0.12	0.53	99.50%	0.003
Flake Silo P	300	0.80	0.12	0.53	99.50%	0.003
Flake Silo Q	300	0.80	0.12	0.53	99.50%	0.003
Flake Silo R	300	0.80	0.12	0.53	99.50%	0.003
Flake Silo S	300	0.80	0.12	0.53	99.50%	0.003
Flake Silo T	300	0.80	0.12	0.53	99.50%	0.003
Totals				10.51		2.14

Total Uncontrolled PTE of PM/PM10/PM2.5 (tons/yr)

Total Controlled PTE of PM/PM10/PM2.5 (tons/yr)

Methodology

*AP-42 Emission Factors for product (plastic pellet) storage in grams/kilogram, Table 6.6.2-1, Edition 9/91 (Reformatted 1/95)
Superscript h, without controls, the estimated emission rate is 0.4 gram/1 kg * 1 lb/453.6 g * 907.18 kg/1 ton = 0.8 lb/ton

**Assume PM is equal to PM10 and PM2.5
PM/PM10/PM2.5 from sixteen (16) indoor silos and one (1) outdoor silo are each controlled using a baghouse filtration system with particulate control efficiency of 99.5%.

Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hour) = [Average Throughput (lbs/hr)] * [ton/2000 lbs] * [Emission Factor (lbs/ton)]
Uncontrolled PTE of PM/PM10/PM2.5 (tons/year) = [Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hour)] * [8760 hours/year] / [2000 lbs/ton]
Controlled PTE of PM/PM10/PM2.5 (tons/year) = [Uncontrolled PTE of PM/PM10/PM2.5 (tons/year)] * [1 - Control Efficiency]

Appendix A: Emissions Calculations
PM Emissions
Unloading of Resin Pellets from Storage Silos to Extruder

Company Name: D & W Fine Pack LLC
Source Address: 7707 Vicksburg Pike, Fort Wayne IN 46804
Administrative Amendment: 003-34606-00346
Reviewer: Renee Traivaranon

Unloading of Resin Pellets from Storage Silos to Extruder

Resin pellets are unloaded through an enclosed system from the thirty-six (36) storage silos located outdoors to Extruders 1 through 10.

Extruder	Maximum Capacity (lbs/hr)	*Emission Factor (lb/ton)	Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hr)**	Uncontrolled PTE of PM/PM10/PM2.5 (tons/yr)**	Control Efficiency (%)	Controlled PTE of PM/PM10/PM2.5 (tons/yr)**	326 IAC 6-3-2 Allowable Particulate Emission Rate (lbs/hr)***
Extruder 1	1200	0.80	0.48	2.10	99.50%	0.0032	NA
Extruder 2	1080	0.80	0.43	1.89	-	1.8922	NA
Extruder 3	2000	0.80	0.80	3.50	99.50%	0.0053	4.10
Extruder 4	1750	0.80	0.70	3.07	95%	0.1533	3.75
Extruder 5	1750	0.80	0.70	3.07	95%	0.1533	3.75
Extruder 6	900	0.80	0.36	1.58	95%	0.0788	NA
Extruder 7	1080	0.80	0.43	1.89	95%	0.0946	NA
Extruder 8	2000	0.80	0.80	3.50	95%	0.1752	4.10
Extruder 9	1300	0.80	0.52	2.28	99.50%	0.0114	NA
Extruder 10	1300	0.80	0.52	2.28	99.50%	0.0114	NA
Totals				25.16		2.58	

Unloading of Resin Pellets from Storage Silos to Extruder

Ground resin pellets are unloaded through an enclosed system from the twenty (20) storage silos located indoors to Extruders 11 through 15.

Extruder	Maximum Capacity (lbs/hr)	*Emission Factor (lb/ton)	Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hr)**	Uncontrolled PTE of PM/PM10/PM2.5 (tons/yr)**	Control Efficiency (%)	Controlled PTE of PM/PM10/PM2.5 (tons/yr)**	326 IAC 6-3-2 Allowable Particulate Emission Rate (lbs/hr)***
Extruder 11	1000	0.80	0.40	1.75	99%	0.0175	NA
Extruder 12	1000	0.80	0.40	1.75	99%	0.0175	NA
Extruder 13	1000	0.80	0.40	1.75	-	1.7520	NA
Extruder 14	1500	0.80	0.60	2.63	99.50%	0.0131	3.38
Extruder 15	1500	0.80	0.60	2.63	99.50%	0.0131	3.38
Totals				10.51		1.81	

Total Uncontrolled PTE of PM/PM10/PM2.5 (tons/yr)	35.67
Total Controlled PTE of PM/PM10/PM2.5 (tons/yr)	4.39

Methodology

*AP-42 Emission Factors for product (plastic pellet) storage in grams/kilogram, Table 6.6.2-1, Edition 9/91 (Reformatted 1/95)

Superscript h, without controls, the estimated emission rate is 0.4 gram/1 kg * 1 lb/453.6 g * 907.18 kg/1 ton = 0.8 lb/ton

**Assume PM is equal to PM10 and PM2.5

***NA = Not applicable, since the uncontrolled potential particulate emissions of each unit are less than five hundred fifty-one thousandths (0.551) pound per hour.

The Extruders have varying levels of control systems for PM/PM10/PM2.5:

Extruder 1: Seventy percent of material processed has a baghouse filtration system with particulate control efficiency of 99.5%.

Extruder 3: Seventy percent of material processed has a baghouse filtration system with particulate control efficiency of 99.5%.

Extruders 4-8: Vacuum system and singed polyester fiber filters with particulate control efficiency of 95%.

Extruders 9-10: Baghouse filtration system with particulate control efficiency of 99.5%.

Extruders 11-12: Prototype filter systems (16 oz felt bags rated to filter to 1 micron according to American Fabric Filter) with particulate control efficiency of 99%.

Extruders 14-15: Baghouse filtration system with particulate control efficiency of 99.5%.

Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hour) = [Average Throughput (lbs/hr)] * [ton/2000 lbs] * [Emission Factor (lbs/ton)]

Uncontrolled PTE of PM/PM10/PM2.5 (tons/year) = [Uncontrolled PTE of PM/PM10/PM2.5 (lbs/hour)] * [8760 hours/year] / [2000 lbs/ton]

**Appendix A: Emissions Calculations
PM and VOC emissions
Extruders**

**Company Name: D & W Fine Pack LLC
Source Address: 7707 Vicksburg Pike, Fort Wayne IN 46804
Administrative Amendment: 003-34606-00346
Reviewer: Renee Traivaranon**

Equipment Name	Maximum Process Weight Rate (lbs/hr)	High Impact Polystyrene (lbs/hr) 22% of Maximum Process Rate	Polypropylene (lbs/hr) 11% of Maximum Process Rate	General Polystyrene (lbs/hr) 60% of Maximum Process Rate	Styrene Butadiene Rubber (lbs/hr) 7% of Maximum Process Rate	*PM/PM10/PM2.5 ⁽¹⁾			VOC - Polypropylene ⁽³⁾			VOC - Polystyrene ⁽²⁾					
						Emission Factor lbs/10 ⁶ lbs	Potential to Emit lbs/hr	Potential to Emit tons/yr	Emission Factor lbs/10 ⁶ lbs	Potential to Emit lbs/hr	Potential to Emit tons/yr	Emission Factor lbs/10 ⁶ lbs	Potential to Emit lbs/hr	Potential to Emit tons/yr			
Extruder 1	1200	264	132	720	84	34.50	0.041	0.181	80.30	0.011	0.046	189	0.202	0.884			
Extruder 2	1080	237.6	118.8	648	75.6	34.50	0.037	0.163	80.30	0.010	0.042	189	0.182	0.796			
Extruder 3	2000	440	220	1200	140	34.50	0.069	0.302	80.30	0.018	0.077	189	0.336	1.474			
Extruder 4	1750	385	192.5	1050	122.5	34.50	0.060	0.264	80.30	0.015	0.068	189	0.294	1.289			
Extruder 5	1750	385	192.5	1050	122.5	34.50	0.060	0.264	80.30	0.015	0.068	189	0.294	1.289			
Extruder 6	900	198	99	540	63	34.50	0.031	0.136	80.30	0.008	0.035	189	0.151	0.663			
Extruder 7	1080	237.6	118.8	648	75.6	34.50	0.037	0.163	80.30	0.010	0.042	189	0.182	0.796			
Extruder 8	2000	440	220	1200	140	34.50	0.069	0.302	80.30	0.018	0.077	189	0.336	1.474			
Extruder 9	1300	286	143	780	91	34.50	0.045	0.196	80.30	0.011	0.050	189	0.219	0.958			
Extruder 10	1300	286	143	780	91	34.50	0.045	0.196	80.30	0.011	0.050	189	0.219	0.958			
Extruder 11	1000	220	110	600	70	34.50	0.035	0.151	80.30	0.009	0.039	189	0.168	0.737			
Extruder 12	1000	220	110	600	70	34.50	0.035	0.151	80.30	0.009	0.039	189	0.168	0.737			
Extruder 13	1000	220	110	600	70	34.50	0.035	0.151	80.30	0.009	0.039	189	0.168	0.737			
Extruder 14	1500	330	165	900	105	34.50	0.052	0.227	80.30	0.013	0.058	189	0.252	1.105			
Extruder 15	1500	330	165	900	105	34.50	0.052	0.227	80.30	0.013	0.058	189	0.252	1.105			
20360.00						Totals			3.08			0.79			15.00		

Total Potential to Emit VOC (tons/year) 15.79

Notes

*Assume PM emissions are equal to PM10 and PM 2.5

Resin types and maximum throughputs were submitted by the source.

The emission factors were taken from technical papers described below in notes 1 through 3. This methodology and the emission factors were also used in Registration No. 005-28577-00102, issued on January 21, 2010 and FESOP No. 019-30695-00103, issued on December 19, 2011.

⁽¹⁾The polypropylene PM emission factor was used for all resin types. The PM emission factors 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.

⁽²⁾The emission factor for VOC emissions for HIPS/PS/SBR 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 General molding VOC emission factor from Table 4 was used.

⁽³⁾The emission factors for 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.

Methodology

Potential to Emit (lbs/yr) = [Maximum Throughput (tons/year)] * [Emission Factor (lbs/ton)]

Potential to Emit (tons/yr) = [Potential to Emit (lbs/yr)] * [ton/2000 lbs]

Appendix A: Emissions Calculations
Potential to Emit Hazardous Air Pollutants (HAPs) from the Extruders

Company Name: D & W Fine Pack LLC
Source Address: 7707 Vicksburg Pike, Fort Wayne IN 46804
Administrative Amendment: 003-34606-00346
Reviewer: Renee Traivaranon

HAP Emission Factors from Processing Polypropylene

HAP Constituent	⁽¹⁾ Emission Factor (lbs/10 ⁶ lbs)
Acetaldehyde	0.2
Acrolein	0.01
Formaldehyde	0.18
Propionaldehyde	0.95

HAP Emission Factors from Processing ABS

HAP Constituent	⁽²⁾ Emission Factor (lbs/10 ⁶ lbs)
Styrene	126
Ethylbenzene	8.02

Equipment Name	Maximum Process Weight Rate (lbs/hr)	High Impact Polystyrene (lbs/hr) 22% of Maximum Process Rate	Polypropylene (lbs/hr) 11% of Maximum Process Rate	General Polystyrene (lbs/hr) 60% of Maximum Process Rate	Styrene Butadiene Rubber (lbs/hr) 7% of Maximum Process Rate	Acetaldehyde Emissions (tons/yr)	Acrolein Emissions (tons/hr)	Formaldehyde Emissions (tons/yr)	Propionaldehyde Emissions (tons/yr)	Styrene Emissions (tons/yr)	Ethylbenzene Emissions (tons/yr)
Extruder 1	1200	264	132	720	84	1.16E-04	5.78E-06	1.04E-04	5.49E-04	0.59	0.04
Extruder 2	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.29	0.02
Extruder 3	1400	308	154	840	98	1.35E-04	6.75E-06	1.21E-04	6.41E-04	0.69	0.04
Extruder 4	1900	418	209	1140	133	1.83E-04	9.15E-06	1.65E-04	8.70E-04	0.93	0.06
Extruder 5	1900	418	209	1140	133	1.83E-04	9.15E-06	1.65E-04	8.70E-04	0.93	0.06
Extruder 6	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.29	0.02
Extruder 7	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.29	0.02
Extruder 8	1900	418	209	1140	133	1.83E-04	9.15E-06	1.65E-04	8.70E-04	0.93	0.06
Extruder 9	900	198	99	540	63	8.67E-05	4.34E-06	7.81E-05	4.12E-04	0.44	0.03
Extruder 10	900	198	99	540	63	8.67E-05	4.34E-06	7.81E-05	4.12E-04	0.44	0.03
Extruder 11	1000	220	110	600	70	9.64E-05	4.82E-06	8.67E-05	4.58E-04	0.49	0.03
Extruder 12	1000	220	110	600	70	9.64E-05	4.82E-06	8.67E-05	4.58E-04	0.49	0.03
Extruder 13	1000	220	110	600	70	9.64E-05	4.82E-06	8.67E-05	4.58E-04	0.49	0.03
Extruder 14	1500	330	165	900	105	1.45E-04	7.23E-06	1.30E-04	6.87E-04	0.74	0.05
Extruder 15	1500	330	165	900	105	1.45E-04	7.23E-06	1.30E-04	6.87E-04	0.74	0.05
Totals						1.72E-03	8.62E-05	1.55E-03	8.19E-03	8.79	0.56

Methodology

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

Notes

⁽¹⁾ 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 oF and reactor impact copolymer was used as the emission factor.

⁽²⁾ Emission factors for HAPs from Styrene 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 of the Journal of Air and Waste Management Association.

**Appendix A: Emissions Calculations
VOC Emissions
Anti-fog Line**

**Company Name: D & W Fine Pack LLC
Source Address: 7707 Vicksburg Pike, Fort Wayne IN 46804
Administrative Amendment: 003-34606-00346
Reviewer: Renee Traivaranon**

Existing Anti-fog Line
Proposed Anti-fog Lines

Actual Annual Throughput (lbs/yr)	Actual Hours Operation (hours/yr)	Potential Throughput (lbs/hour)	Weight % Volatiles	PTE of VOC (tons/yr)
4752	4000	1.188	4%	0.21
9504	4000	2.376	4%	0.42

0.62

Methodology

The antifog line applies a sugar based solution to the clear extruded sheet to reduce moisture buildup when the product is used with hot food. The facility used 4752 pounds of the product during 2011.
 Potential throughput Use lb/hr = Actual Annual Throughput (lbs/yr)/Actual Hours Operation (hours/yr)
 VOC = [Weight % Volatiles (water minus organics)] * [Potential throughput Use lb/hr*8760 hr/yr*1 ton/2000 lbs] = Tons per Year

**Appendix A: Emissions Calculations
PM and VOC Emissions
Thermoformers**

**Company Name: D & W Fine Pack LLC
Source Address: 7707 Vicksburg Pike, Fort Wayne IN 46804
Administrative Amendment: 003-34606-00346
Reviewer: Renee Traivanon**

Total Bottleneck Throughput for all Extruders (lbs/hr)	20360	
Number of Thermoformers	30	(There are 30 units)
Average Bottleneck Throughput of Each Thermoformer (lbs/hr)	679	(each Thermoformer)

Equipment Name	Average Bottleneck Throughput (lbs/hr)	High Impact Polystyrene (lbs/hr) 22% of Maximum Process Rate	Polypropylene (lbs/hr) 11% of Maximum Process Rate	General Polystyrene (lbs/hr) 60% of Maximum Process Rate	Styrene Butadiene Rubber (lbs/hr) 7% of Maximum Process Rate	*PM/PM10/PM2.5 ⁽¹⁾			VOC - Polypropylene ⁽²⁾			VOC - Polystyrene ⁽²⁾		
						Emission Factor lbs/10 ⁶ lbs	Potential to Emit lbs/hr	Potential to Emit tons/yr	Emission Factor lbs/10 ⁶ lbs	Potential to Emit lbs/hr	Potential to Emit tons/yr	Emission Factor lbs/10 ⁶ lbs	Potential to Emit lbs/hr	Potential to Emit tons/yr
Thermoformer 2	600	132	66	360	42	34.5	0.021	0.091	80.3	0.005	0.023	189	0.101	0.442
Thermoformer 3	600	132	66	360	42	34.5	0.021	0.091	80.3	0.005	0.023	189	0.101	0.442
Thermoformer 4	600	132	66	360	42	34.5	0.021	0.091	80.3	0.005	0.023	189	0.101	0.442
Thermoformer 5	600	132	66	360	42	34.5	0.021	0.091	80.3	0.005	0.023	189	0.101	0.442
Thermoformer 6	600	132	66	360	42	34.5	0.021	0.091	80.3	0.005	0.023	189	0.101	0.442
Thermoformer 7	600	132	66	360	42	34.5	0.021	0.091	80.3	0.005	0.023	189	0.101	0.442
Thermoformer 8	600	132	66	360	42	34.5	0.021	0.091	80.3	0.005	0.023	189	0.101	0.442
Thermoformer 9	600	132	66	360	42	34.5	0.021	0.091	80.3	0.005	0.023	189	0.101	0.442
Thermoformer 10	600	132	66	360	42	34.5	0.021	0.091	80.3	0.005	0.023	189	0.101	0.442
Thermoformer 11	600	132	66	360	42	34.5	0.021	0.091	80.3	0.005	0.023	189	0.101	0.442
Thermoformer 12	600	132	66	360	42	34.5	0.021	0.091	80.3	0.005	0.023	189	0.101	0.442
Thermoformer 13	600	132	66	360	42	34.5	0.021	0.091	80.3	0.005	0.023	189	0.101	0.442
Thermoformer 14	600	132	66	360	42	34.5	0.021	0.091	80.3	0.005	0.023	189	0.101	0.442
Thermoformer 15	600	132	66	360	42	34.5	0.021	0.091	80.3	0.005	0.023	189	0.101	0.442
Thermoformer 16	600	132	66	360	42	34.5	0.021	0.091	80.3	0.005	0.023	189	0.101	0.442
Thermoformer 17	1000	220	110	600	70	34.5	0.035	0.151	80.3	0.009	0.039	189	0.168	0.737
Thermoformer 18	1000	220	110	600	70	34.5	0.035	0.151	80.3	0.009	0.039	189	0.168	0.737
Thermoformer 19	1000	220	110	600	70	34.5	0.035	0.151	80.3	0.009	0.039	189	0.168	0.737
Thermoformer 20	600	132	66	360	42	34.5	0.021	0.091	80.3	0.005	0.023	189	0.101	0.442
Thermoformer 21	600	132	66	360	42	34.5	0.021	0.091	80.3	0.005	0.023	189	0.101	0.442
Thermoformer 22	600	132	66	360	42	34.5	0.021	0.091	80.3	0.005	0.023	189	0.101	0.442
Thermoformer 23	600	132	66	360	42	34.5	0.021	0.091	80.3	0.005	0.023	189	0.101	0.442
Thermoformer 24	600	132	66	360	42	34.5	0.021	0.091	80.3	0.005	0.023	189	0.101	0.442
Thermoformer 25	600	132	66	360	42	34.5	0.021	0.091	80.3	0.005	0.023	189	0.101	0.442
Thermoformer 26	600	132	66	360	42	34.5	0.021	0.091	80.3	0.005	0.023	189	0.101	0.442
Thermoformer 27	1000	220	110	600	70	34.5	0.035	0.151	80.3	0.009	0.039	189	0.168	0.737
Thermoformer 28	1000	220	110	600	70	34.5	0.035	0.151	80.3	0.009	0.039	189	0.168	0.737
Thermoformer 29	1000	220	110	600	70	34.5	0.035	0.151	80.3	0.009	0.039	189	0.168	0.737
Thermoformer 30	1000	220	110	600	70	34.5	0.035	0.151	80.3	0.009	0.039	189	0.168	0.737
Thermoformer 31	1000	220	110	600	70	34.5	0.035	0.151	80.3	0.009	0.039	189	0.168	0.737
Total 30 Thermoformers	20360	4479.2	2239.6	12216	1425.2	34.5	0.702	3.077	80.3	0.180	0.788	189	3.425	15.000

Potential PM (Unit#31)	0.151	tons per year
Potential VOC (Unit#31)	0.78	tons per year
Total Potential PM (All Units)	3.077	tons per year
Total Potential VOC (All units)	15.79	tons per year

Methodology

*Assume PM emissions are equal to PM10 and PM2.5.

Emissions (lbs/hr) = [Max Throughput Rate (lbs/hr)] * [Emission Factor (lbs/10⁶ lbs) / 1000000]

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

Notes

Resin types and maximum throughputs were submitted by the source.

The emission factors were taken from technical papers described below in notes 1 through 3. This methodology and the emission factors were also used in Registration No. 005-28577-00102, issued on January 21, 2010 and FESOP No. 019-30695-00103, issued on December 19, 2011.

⁽¹⁾ The polypropylene emission factor for PM was used for all resin types. The PM emission factors 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.

⁽²⁾ The emission factor for VOC emissions for HIPS/PS/SBR 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 General molding VOC emission factor from Table 4 was used.

⁽³⁾ The emission factors for 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.

These emissions are exhausted through the Rietschle VC700 Vacuum Pump, The stack diameter is 12" pipe, and extends from roof to a height of 36', the exit temperature is 100°F to 150°F

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

Company Name: D & W Fine Pack LLC
 Source Address: 7707 Vicksburg Pike, Fort Wayne IN 46804
 Administrative Amendment: 003-34606-00346
 Reviewer: Renee Traivaranon

HAP Emission Factors from Processing Polypropylene

HAP Constituent	⁽¹⁾ Emission Factor (lbs/10 ⁶ lbs)
Acetaldehyde	0.2
Acrolein	0.01
Formaldehyde	0.18
Propionaldehyde	0.95

HAP Emission Factors from Processing ABS

HAP Constituent	⁽²⁾ Emission Factor (lbs/10 ⁶ lbs)
Styrene	6.3
Ethylbenzene	8.02

Equipment Name	Maximum Process Weight Rate (lbs/hr)	High Impact Polystyrene (lbs/hr) 22% of Maximum Process Rate	Polypropylene (lbs/hr) 11% of Maximum Process Rate	General Polystyrene (lbs/hr) 60% of Maximum Process Rate	Styrene Butadiene Rubber (lbs/hr) 7% of Maximum Process Rate	Acetaldehyde Emissions (tons/yr)	Acrolein Emissions (tons/hr)	Formaldehyde Emissions (tons/yr)	Propionaldehyde Emissions (tons/yr)	Styrene Emissions (tons/yr)	Ethylbenzene Emissions (tons/yr)
Thermoformer 2	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.01	0.02
Thermoformer 3	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.01	0.02
Thermoformer 4	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.01	0.02
Thermoformer 5	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.01	0.02
Thermoformer 6	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.01	0.02
Thermoformer 7	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.01	0.02
Thermoformer 8	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.01	0.02
Thermoformer 9	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.01	0.02
Thermoformer 10	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.01	0.02
Thermoformer 11	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.01	0.02
Thermoformer 12	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.01	0.02
Thermoformer 13	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.01	0.02
Thermoformer 14	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.01	0.02
Thermoformer 15	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.01	0.02
Thermoformer 16	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.01	0.02
Thermoformer 17	1000	220	110	600	70	9.64E-05	4.82E-06	8.67E-05	4.58E-04	0.02	0.03
Thermoformer 18	1000	220	110	600	70	9.64E-05	4.82E-06	8.67E-05	4.58E-04	0.02	0.03
Thermoformer 19	1000	220	110	600	70	9.64E-05	4.82E-06	8.67E-05	4.58E-04	0.02	0.03
Thermoformer 20	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.01	0.02
Thermoformer 21	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.01	0.02
Thermoformer 22	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.01	0.02
Thermoformer 23	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.01	0.02
Thermoformer 24	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.01	0.02
Thermoformer 25	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.01	0.02
Thermoformer 26	600	132	66	360	42	5.78E-05	2.89E-06	5.20E-05	2.75E-04	0.01	0.02
Thermoformer 27	1000	220	110	600	70	9.64E-05	4.82E-06	8.67E-05	4.58E-04	0.02	0.03
Thermoformer 28	1000	220	110	600	70	9.64E-05	4.82E-06	8.67E-05	4.58E-04	0.02	0.03
Thermoformer 29	1000	220	110	600	70	9.64E-05	4.82E-06	8.67E-05	4.58E-04	0.02	0.03
Thermoformer 30	1000	220	110	600	70	9.64E-05	4.82E-06	8.67E-05	4.58E-04	0.02	0.03
Thermoformer 31	1000	220	110	600	70	9.64E-05	4.82E-06	8.67E-05	4.58E-04	0.02	0.03
Total 30 Thermoformers	20360	4479.2	2239.6	12216	1425.2	1.96E-03	9.81E-05	1.77E-03	9.32E-03	0.50	0.64

Totals 1.96E-03 9.81E-05 1.77E-03 9.32E-03 0.5 0.64

Methodology

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

Notes

⁽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 oF and reactor impact copolymer was used as the emission factor.

⁽²⁾ Emission factors for HAPs from Styrene 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 of the Journal of Air and Waste Management Association.

**Appendix A: Emissions Calculations
PM Emissions
Flaking (Cutting) Operation**

**Company Name: D & W Fine Pack LLC
Source Address: 7707 Vicksburg Pike, Fort Wayne IN 46804
Administrative Amendment: 003-34606-00346
Reviewer: Renee Traivaranon**

Total Bottleneck Throughput for all Extruders (lbs/hr)	20360
Percent Scrap (%)	15.60%
Potential Scrap Throughput (lbs/hr)	3176.2
Potential Scrap Throughput (tons/year)	13911.6

Potential to Emit (PTE) PM/PM10/PM2.5 and VOC of Flaker #43

Equipment Name	PM/PM10/PM2.5*				Volatile Organic Compounds (VOC)		
	Emission Factor (lbs/ton)	Pollutant	Potential to Emit (lbs/hr)	Potential to Emit (tons/yr)	Emission Factor lbs/10 ⁶ lbs	Potential to Emit lbs/hr	Potential to Emit (tons/yr)
Flaker #43 with capacity	0.35	PM	0.07	0.31	189.0	0.1	0.33
400	0.20	*PM10	0.04	0.18	-	-	-
Lbs/hr	0.20	*PM2.5	0.04	0.18	-	-	-

Total Potential to Emit (PTE) PM/PM10/PM2.5 and VOC

Equipment Name	PM/PM10/PM2.5*				Volatile Organic Compounds (VOC)		
	Emission Factor (lbs/ton)	Pollutant	Potential to Emit (lbs/hr)	Potential to Emit (tons/yr)	Emission Factor lbs/10 ⁶ lbs	Potential to Emit lbs/hr	Potential to Emit (tons/yr)
Flakers 1 through 43	0.35	PM	0.5558	2.43	189.0	0.6	2.63
(total of all grinders)	0.20	*PM10	0.32	1.39	-	-	-
	0.20	*PM2.5	0.32	1.39	-	-	-

* Assume PM2.5 emissions equal to PM10

Methodology

There are no AP-42 Emission Factors for grinding of plastic. As a conservative estimate, IDEM has estimated emissions for plastic grinding using log sawing.

Plastic Grinding Emission Factors are from AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants

EPA March 1990 for Sawmill Operations (Log Sawing: General) (SCC 3-07-008-03)

Potential to Emit (lbs/yr) = [Maximum Throughput (tons/year)] * [Emission Factor (lbs/ton)]

Potential to Emit (tons/yr) = [Potential to Emit (lbs/yr)] * [ton/2000 lbs]

Plastic Flaking (Cutting) VOC Emission Factor is the same as the VOC Emission Factors for Thermoforming and Extruding because the cutting/flaking operation should release no more VOC emissions than the extruding and thermoforming operations which involve higher temperatures and occur before the cutting/flaking operation.

VOC Emission (tons/yr) = [Throughput (tons/yr)] * [Emission Factor (lb/ton)/2000 lb/ton]

**Appendix A: Emissions Calculations
VOC Emissions
UV Printing**

**Company Name: D & W Fine Pack LLC
Source Address: 7707 Vicksburg Pike, Fort Wayne IN 46804
Administrative Amendment: 003-34606-00346
Reviewer: Renee Traivaranon**

Throughput	Ink VOCs				
Press I.D.	Ink ID.	Maximum Ink Use/hour (pounds)	Weight % Volatiles	Flash Off %	VOC Emissions (tons/yr)
Printer 1 Printer 2 & Printer 3	Eastgate Graphics Inc. UV Printing Inks	45.66	0.1%	100.00%	0.20

Total VOC Emissions =	0.20
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Methodology

VOC = [Weight % Volatiles (water minus organics)] * [Flash off % * Max Ink Use/hr*8760 hr/yr*1 ton/2000 lbs] = Tons per Year

Weight % VOC in Ultraviolet Ink Specified in MSDS as less than 0.1% (use 0.1% VOC assumption as worst case)

Acrylate Ester identified as hazardous ingredient, this is not a HAP that IDEM OAQ calculates.

NOTE: Heat set offset printing has an assumed flash off of 80%. Other types of printers have a flash off of 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93)")

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

Company Name: D & W Fine Pack LLC
Source Address: 7707 Vicksburg Pike, Fort Wayne IN 46804
Administrative Amendment: 003-34606-00346
Reviewer: Renee Traivaranon

ID #	Year	BTU Input
1	1992	100,000
2	1992	210,000
3	1992	350,000
4	1992	165,000
5	1992	144,000
6	1992	794,000
7	1992	794,000
8	1992	570,000
9	1992	907,000
10	1992	907,000
11	1992	2,019,600
12	1992	692,000
13	1992	692,000
14	1992	1,037,000
15	1992	325,000
16	1992	1,033,000
17	1992	1,836,000
18	1992	1,950,000
19	1992	1,950,000
20	1992	1,950,000
21	2001	400,000
22	2001	200,000
23	2001	200,000

ID #	Year	BTU Input
24	2001	25,000
25	2001	25,000
26	2001	25,000
27	2001	25,000
28	2001	400,000
29	2001	2,764,800
30	2001	2,160,000
31	2001	3,024,000
32	2001	2,073,600
33	2001	1,468,800
34	2001	200,000
35	2001	45,000
36	2001	400,000
37	2005	3,421,000
38	2005	3,421,000
39	2005	3,421,000
40	2005	3,041,000
41	2005	1,616,000
42	2005	2,376,000
43	2005	3,326,000
44	2005	2,376,000
45	2005	1,331,000

Total Gas Load	56,165,800	BTU/Hour
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Heat Input Capacity MMBtu/hr	HHV mmBtu mmiscf	Potential Throughput MMCF/yr
56.2	1020	482.4

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.46	1.83	1.83	0.14	24.12	1.33	20.26

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM 2.5 emission factor is filterable and condensable PM2.5 combined.
**Emission Factors for Nox: Uncontrolled = 100, Low Nox Burner = 50, Low Nox Burners/Flue gas recirculation = 32

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	5.1E-04	2.894E-04	0.02	0.43	8.200E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.206E-04	2.653E-04	3.377E-04	9.165E-05	5.065E-04

Total HAPs 0.46 tons per year

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Potential Throughput (MMCF) = [Heat Input Capacity (MMBtu/hr)] * [8,760 hrs/yr] * [1 MMCF/1,000 MMBtu]
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-01-006-02, 1-02-006-02, 1-03-006-02, and 1-03-006-03
Emission (tons/yr) = Throughput (MMCF/yr) * Emission Factor (lb/MMCF)/2,000 lb/ton
The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Natural Gas Combustion
Greenhouse Gas Emissions**

**Company Name: D & W Fine Pack LLC
Source Address: 7707 Vicksburg Pike, Fort Wayne IN 46804
Administrative Amendment: 003-34606-00346
Reviewer: Renee Traivaranon**

	Greenhouse Gas - NG Combustion		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	28,941.9	0.55	0.53
Summed Potential Emissions in tons/yr	28,943		
CO2e Total in tons/yr based on 11/29/2013 federal GWPs	29,114		
CO2e Total in tons/yr based on 10/30/2009 federal GWPs	29,118		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Natural Gas (NG) 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) * Emission Factor (lb/MMCF)/2,000 lb/ton

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

CO2e (tons/yr) based on 10/30/2009 federal GWPs = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

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

**Company Name: D & W Fine Pack LLC
Source Address: 7707 Vicksburg Pike, Fort Wayne IN 46804
Administrative Amendment: 003-34606-00346
Reviewer: Renee Traivaranon**

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 (1/2011).

Vehicle Information (provided by source)

Type of Traffic	Vehicle Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (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)
Vehicle Type 1 (entering plant) (one-way trip)	Tractor trailer	20.0	1.0	20.0	20.0	400.0	825	0.156	3.1	1140.6
Vehicle Type 1 (leaving plant) (one-way trip)	Tractor trailer	20.0	1.0	20.0	32.5	650.0	825	0.156	3.1	1140.6
Vehicle Type 2 (entering plant) (one-way trip)	Bulk Truck	1.0	1.0	1.0	44.0	44.0	825	0.156	0.2	57.0
Vehicle Type 2 (leaving plant) (one-way trip)	Bulk Truck	1.0	1.0	1.0	20.0	20.0	825	0.156	0.2	57.0
Total				42.0		1114.0			6.6	2395.3

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

Unmitigated Emission Factor, Ef = [k * (sL)^{0.91} * (W)^{1.02}] (Equation 1 from AP-42 13.2.1)

where k =	PM	PM10	PM2.5	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	0.011	0.0022	0.00054	tons = average vehicle weight (provided by source)
sL =	26.5	26.5	26.5	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)
	9.7	9.7	9.7	

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext =
where p = days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = days per year

Unmitigated Emission Factor, Ef =	PM	PM10	PM2.5	lb/mile
Mitigated Emission Factor, Eext =	2.463	0.493	0.1209	lb/mile
	2.252	0.450	0.1106	lb/mile

Type of Traffic	Vehicle Type	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)
Vehicle Type 1 (entering plant) (one-way trip)	Tractor trailer	1.40	0.28	0.07	1.28	0.26	0.06
Vehicle Type 1 (leaving plant) (one-way trip)	Tractor trailer	1.40	0.28	0.07	1.28	0.26	0.06
Vehicle Type 2 (entering plant) (one-way trip)	Bulk Truck	0.07	0.01	0.00	0.06	0.01	0.00
Vehicle Type 2 (leaving plant) (one-way trip)	Bulk Truck	0.07	0.01	0.00	0.06	0.01	0.00
Total		2.95	0.59	0.14	2.70	0.54	0.13

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight of Loaded Vehicle (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 = Particulate Matter (<2.5 um)
PTE = Potential to Emit



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

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

TO: Phil Marshall
D & W Fine Pack, LLC
7707 Vicksburg Pike
Port Wayne, IN 46804

DATE: July 2, 2014

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

SUBJECT: Final Decision
Administrative Amendment
003-34606-00346

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:
Jay DuBois – VP of Manufacturing
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

Mail Code 61-53

IDEM Staff	GHOTOPP 7/2/2014 D & W Fine Pack LLC 003-34606-00346 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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1		Phil Marshall D & W Fine Pack LLC 7707 Vicksburg Pike Fort Wayne IN 46804 (Source CAATS) via confirmed delivery										
2		Jay DuBois VP of Mfg D & W Fine Pack LLC 1900 Pratt Blvd Elk Groove Village IL 60007 (RO CAATS)										
3		Allen Co. Board of Commissioners 200 E Berry Street Ste 410 Fort Wayne IN 46802 (Local Official)										
4		Fort Wayne-Allen County Health Department 200 E Berry St Suite 360 Fort Wayne IN 46802 (Health Department)										
5		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
6		Duane & Deborah Clark Clark Farms 6973 E. 500 S. Columbia City IN 46725 (Affected Party)										
7		Fort Wayne City Council and Mayors Office 200 E Berry Street Ste 120 Fort Wayne IN 46802 (Local Official)										
8		Mr. Jeff Coburn Plumbers & Steamfitters, Local 166 2930 W Ludwig Rd Fort Wayne IN 46818-1328 (Affected Party)										
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