



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

To: Interested Parties

Date: November 3, 2014

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

Source Name: Ardagh Glass Inc

Permit Level: Title V Administrative Amendment

Permit Number: 135-34777-00012

Source Location: 603 E North street Winchester, Indiana 47394

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 34777.

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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Michael R. Pence  
Governor

Thomas W. Easterly  
Commissioner

Gary Jarrett  
Ardagh Glass Inc.  
603 East North Street  
Winchester, Indiana 47394

November 3, 2014

Re: 135-34777-00012  
Administrative Amendment to  
Part 70 Renewal T135-27245-00012

Dear Gary Jarrett:

Ardagh Glass Inc. was issued a Part 70 Permit Renewal No. T135-27245-00012 on September 17, 2009, for a stationary glass container manufacturing source located at 603 East North Street, Winchester, Indiana 47394. On July 20, 2014, the Office of Air Quality (OAQ) received an application from the source requesting to undertake a cold repair of Furnace #2. This project will not increase the Potential to Emit (PTE) of any regulated pollutant at the plant and will not cause a significant net emissions increase of any regulated pollutant.

Pursuant to the provisions of 326 IAC 2-7-11(a), the permit is hereby administratively amended as described in the attached Technical Support Document.

1. Pursuant to 326 IAC 2-7-11(a)(7), this change to the permit is considered an administrative amendment because the permit is amended to change the descriptive information where the revision will not trigger a new applicable requirement or violate a permit term.

See Appendix A for the PTE of the source after the cold repair of the emission unit and an Actual to Projected Actual (ATPA) analysis of the proposed project.

All other conditions of the permit shall remain unchanged and in effect.

Please find attached the entire Part 70 Operating Permit as amended.

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 Michelle Robinson of my staff, at 317-234-8733 or 1-800-451-6027, and ask for extension 4-8733.

Sincerely,

Chrystal A. Wagner, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Updated Permit, Technical Support Document and Appendix A

CAW/MR

cc: File - Randolph County  
Randolph County Health Department  
U.S. EPA, Region 5  
Compliance and Enforcement Branch  
Billing, Licensing and Training Section



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

## Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Ardagh Glass Inc.  
603 East North Street  
Winchester, Indiana 47394**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T135-27245-00012	
Issued by/Original Signed by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 17, 2009  Expiration Date: September 17, 2014

First Administrative Amendment No. 135-32350-00012, issued on October 9, 2012

Second Administrative Amendment No. 135-32395-00012

Third Administrative Amendment No. 135-34777-00012	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 3, 2014  Expiration Date: September 17, 2014

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**Emergency Occurrence Report**

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## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary glass container manufacturing source.

Source Address:	603 East North Street, Winchester, Indiana 47394
Mailing Address:	603 East North Street, Winchester, Indiana 47394
General Source Phone Number:	765-584-6101
SIC Code:	3221
County Location:	Randolph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) natural gas-fired glass Furnace, identified as Furnace #1, constructed in 1971, with a maximum design melt capacity of 344 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST7;
- (b) One (1) natural gas-fired glass Furnace, identified as Furnace #2, constructed in 1973 and approved in 2014 for modification, with a maximum design melt capacity of 448 tons of glass per day and a maximum pull rate of 390 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST8;
- (c) One (1) raw materials batch storage and conveying process, constructed in 1929, with a maximum capacity of 1,200 tons per day, with emissions uncontrolled and exhausting inside the building;
- (d) One (1) raw materials batch mixing process, constructed in 1929, with a maximum capacity of 1,200 tons per day, with emissions controlled by baghouse BH1 which exhausts to stack ST9 and baghouse BH2 which exhausts inside the building;
- (e) One (1) glass Furnace day bin, servicing Furnace #1, constructed in 1940, with a maximum capacity of 550 tons per day, controlled by baghouse BH3 with emissions exhausting to stack ST5;
- (h) One (1) glass Furnace day bin, servicing Furnace #2, constructed in 1991, with a maximum capacity of 650 tons per day, controlled by baghouse BH4 with emissions exhausting to stack ST6;

- (i) Two (2) solvent washers, constructed after January 1, 1980, using non-HAP cleaners, each with the potential to emit greater than fifteen (15) pounds of VOC per day and/or using greater than 145 gallons of solvent per year; and
- (j) Cullet crushing operations, with a throughput of 26,000 tons per year.

A.3 Specifically Regulated Insignificant Activities  
[326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

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

- (a) The following activities with uncontrolled PTE of PM<sub>10</sub> less than 5 lb/hr and 25 lb/day:
  - (1) One (1) cardboard baler, with a throughput of 360 tons per year;
  - (2) One (1) mold swabbing operation, including multiple forming machines with a throughput of 4,800 gallons per year;
  - (3) One (1) hot end treatment operations, including multiple coating hoods with a throughput of 24,000 pounds per year; and
  - (4) Mold shop operations, with a throughput of 24,000 pounds per year. [326 IAC 6-3-2]
- (b) Five (5) parts washers used for maintenance purposes throughout the facility, all constructed after January 1, 1980. [326 IAC 8-3-2]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

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

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

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

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- (a) This permit, T135-27245-00012, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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- (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. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

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

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

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) 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.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

Telephone Number: 317-233-0178 (ask for Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865

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

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

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

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

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report. Any emergencies that have been previously reported pursuant to

paragraph (b)(5) of this condition and certified by the "responsible official" need only referenced by the date of the original report.

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

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

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

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- (a) All terms and conditions of permits established prior to T135-27245-00012 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported 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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]**

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

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

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**B.19 Permit Revision Under Economic Incentives and Other Programs**

[326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

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

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

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

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(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

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

(4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue

MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

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

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

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

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

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

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

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

**B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]**

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ. A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### **Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

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

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- (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.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]**

**C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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

**C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) Upon detecting an excursion or exceedance, the Permittee shall 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 emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned 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 within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (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 maintain the following records:
- (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:  
Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue

MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The emission statement 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.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]  
[326 IAC 2-2][326 IAC 2-3]

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- (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, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later.
- (c) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b)) that a “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
- (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
- (A) A description of the project.
- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
- (i) Baseline actual emissions;
- (ii) Projected actual emissions;
- (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and

- (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
  - (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
  - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and 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
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1

(qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
  - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
  - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
  - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part 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

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

### **Stratospheric Ozone Protection**

#### **C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) natural gas-fired glass Furnace, identified as Furnace #1, constructed in 1971, with a maximum design melt capacity of 344 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST7;
- (b) One (1) natural gas-fired glass Furnace, identified as Furnace #2, constructed in 1973 and approved in 2014 for modification, with a maximum design melt capacity of 448 tons of glass per day and a maximum pull rate of 390 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST8;
- (c) One (1) glass Furnace day bin, servicing Furnace #1, constructed in 1940, with a maximum capacity of 550 tons per day, controlled by baghouse BH3 with emissions exhausting to stack ST5; and
- (d) One (1) glass Furnace day bin, servicing Furnace #2, constructed in 1991, with a maximum capacity of 650 tons per day, controlled by baghouse BH4 with emissions exhausting to stack ST6.

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

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

#### D.1.1 PSD Minor Limit [326 IAC 2-2]

Pursuant to Administrative Amendment 135-5897-00012, issued on May 28, 1996, the pull rate of Furnace #2 shall be limited to less than 390 tons per day.

Additionally, the following emissions limits apply to Furnace #2:

- (a) Particulate matter (PM) emissions shall not exceed 19.06 pounds per hour;
- (b) Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 83.6 pounds per hour; and
- (c) Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 116.6 pounds per hour.

These limits are required to render the requirements of 326 IAC 2-2 (PSD) not applicable.

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

Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Sources), the following limits apply to the source:

- (a) The particulate emissions from Furnace #1 shall not exceed 24.40 pounds per hour when operating at the maximum design melt capacity of 14.33 tons per hour.
- (b) The particulate emissions from Furnace #2 shall not exceed 26.55 pounds per hour when operating at the maximum design melt capacity of 16.25 tons per hour.
- (c) The particulate emissions from the Furnace #1 Day Bin shall not exceed 33.43 pounds per hour when operating at the maximum capacity of 22.92 tons per hour.
- (d) The particulate emissions from the Furnace #2 Day Bin shall not exceed 37.38 pounds

per hour when operating at the maximum capacity of 27.08 tons per hour.

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

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

**D.1.3 Preventive Maintenance Plans [326 IAC 1-6-3] [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Condition B.10 - Preventive Maintenance Plan of this permit, is required for Furnaces #1 and #2.

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

**D.1.4 Visible Emission Notations**

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- (a) Visible emission notations of each furnace stack exhaust and each day bin stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

**D.1.5 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records of the pull rate of Furnace #2 each day of operation.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain daily records of the visible emission notations of each furnace stack exhaust and each day bin stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (e.g. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.6 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) raw materials batch storage and conveying process, constructed in 1929, with a maximum capacity of 1,200 tons per day, with emissions uncontrolled and exhausting inside the building;
- (b) One (1) raw materials batch mixing process, constructed in 1929, with a maximum capacity of 1,200 tons per day, with emissions controlled by baghouse BH1 which exhausts to stack ST9 and baghouse BH2 which exhausts inside the building;
- (c) Cullet crushing operations, with a throughput of 26,000 tons per year

### Insignificant Activities:

- (d) The following activities with uncontrolled PTE of PM<sub>10</sub> less than 5 lb/hr and 25 lb/day:
  - (1) One (1) cardboard baler, with a throughput of 360 tons per year;
  - (2) One (1) mold swabbing operation, including multiple forming machines with a throughput of 4,800 gallons per year;
  - (3) One (1) hot end treatment operations, including multiple coating hoods with a throughput of 24,000 pounds per year; and
  - (4) Mold shop operations, with a throughput of 24,000 pounds per year. [326 IAC 6-3-2]

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

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

#### D.2.1 Particulate Matter [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Sources), the following limits apply to the source:
  - (1) The particulate emissions from the Batch Storage and Conveyance processes shall not exceed 44.58 pounds per hour when operating at the maximum capacity of 50 tons per hour.
  - (2) The particulate emissions from the Batch Mixing process shall not exceed 44.58 pounds per hour when operating at the maximum capacity of 50 tons per hour.

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour} \\ \text{and } P = \text{process weight rate in tons per hour}$$

- (3) The particulate emissions from the Cullet Crushing operation shall not exceed 8.5 pounds per hour when operating at the maximum capacity of 2.97 tons per hour.

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

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

- (b) Pursuant to 326 IAC 6-3-2(e)(2), the particulate emissions from the cardboard baler, mold swabbing operations, hot end treatment operations, and mold shop shall not exceed 0.551 pounds per hour, each, when operating at the maximum capacity of less than 100 pounds per hour.

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Two (2) solvent washers, constructed after January 1, 1980, using non-HAP cleaners, each with the potential to emit greater than fifteen (15) pounds of VOC per day and/or using greater than 145 gallons of solvent per year.

#### *Insignificant Activities:*

- (b) Five (5) parts washers used for maintenance purposes throughout the facility, all constructed after January 1, 1980. [326 IAC 8-3-2]

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

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

#### D.3.1 Volatile Organic Compounds [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-1(a)(2), the seven (7) cold cleaners are subject to the following requirements:

- (a) The owner or operator of a cold cleaning facility shall:
- (1) equip the cleaner with a cover;
  - (2) equip the cleaner with a facility for draining cleaned parts;
  - (3) close the degreaser cover whenever parts are not being handled in the cleaner;
  - (4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
  - (5) provide a permanent, conspicuous label summarizing the operating requirements;
  - (6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Ardagh Glass Inc.  
Source Address: 603 East North Street, Winchester, Indiana 47394  
Part 70 Permit No.: T135-27245-00012

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Ardagh Glass Inc.  
Source Address: 603 East North Street, Winchester, Indiana 47394  
Part 70 Permit No.: T135-27245-00012

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

**Page 2 of 2**

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**Part 70 Usage Report**  
(Submit Report Quarterly)

Source Name: Ardagh Glass Inc.  
Source Address: 603 East North Street, Winchester, Indiana 47394  
Part 70 Permit No.: T135-27245-00012  
Facility: Furnace #2  
Parameter: Daily Pull Rate  
Limit: The pull rate of Furnace #2 shall be limited to less than 390 tons per day.

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day		Day	
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			

No deviation occurred in this month.

Deviation/s occurred in this month.

Deviation has been reported on:

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

Source Name: Ardagh Glass Inc.  
Source Address: 603 East North Street, Winchester, Indiana 47394  
Part 70 Permit No.: T135-27245-00012

**Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_**

Page 1 of 2

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

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**Technical Support Document (TSD) for a  
Part 70 Administrative Amendment**

**Source Description and Location**

Source Name:	Ardagh Glass Inc.
Source Location:	603 East North Street, Winchester, Indiana 47394
County:	Randolph
SIC Code:	3221
Operation Permit No.:	T135-27245-00012
Operation Permit Issuance Date:	September 17, 2009
Administrative Amendment No.:	135-34777-00012
Permit Reviewer:	Michelle Robinson

**Existing Approvals**

The source submitted an application for a Part 70 Operating Permit Renewal on November 22, 2013. At this time, this application is still under review. The source is operating under the following approvals:

- (a) Part 70 Operating Permit Renewal No. T135-27245-00012, issued on September 17, 2009;
- (b) Review Request No. 135-28859-00012, issued on January 22, 2012;
- (c) Administrative Amendment No. 135-32350-00012, issued on October 9, 2012; and
- (d) Administrative Amendment No. 135-32395-00012, issued on October 16, 2012.

**County Attainment Status**

The source is located in Randolph County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

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

- (a) Ozone Standards  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are

considered when evaluating the rule applicability relating to ozone. Randolph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) PM<sub>2.5</sub>  
Randolph County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (e) Other Criteria Pollutants  
Randolph County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Fugitive Emissions

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

### Source Status - Existing Source

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

Pollutant	Emissions (ton/yr)
PM	172.29
PM <sub>10</sub>	177.16
PM <sub>2.5</sub>	177.16
SO <sub>2</sub>	455.45
NO <sub>x</sub>	830.52
VOC	52.18
CO	26.80
GHGs as CO <sub>2</sub> e	194,902
Total HAPs	3.075
Worst Single HAP	2.934 (Hexane)

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146\\_4q18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4q18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a PSD regulated pollutant, excluding GHGs, is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
- (c) These emissions are based upon Appendix A of this TSD.

#### **Description of Proposed Modification**

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Ardagh Glass Inc. on July 20, 2014, relating to the following changes to one of the source's two glass furnaces:

1. Rebricking of glass melting furnace, regenerators, distributor, and equalizing refractories of the forehearth
2. Installation of insulating materials for the furnace
3. Replacement of existing furnace pipe burners with an estimated rating of 100 MMBtu/hr with Eclipse Bright Fire burners with a rating of 80 MMBtu/hr
4. Modification of electrode spacing
5. Upgrade of forehearth controls

The following is the modified emission unit:

- (a) One (1) natural gas-fired glass Furnace, identified as Furnace #2, constructed in 1973 and approved in 2014 for modification, with a maximum design melt capacity of 448 tons of glass per day and a maximum pull rate of 390 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST8.

#### **Enforcement Issues**

There are no pending enforcement actions related to this modification.

#### **Emission Calculations**

See Appendix A of this Technical Support Document for detailed emission calculations.

#### **Permit Level Determination – Part 70 Modification to an Existing Source**

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

As demonstrated in Appendix A of this Technical Support Document, there is no increase in the potential to emit of any regulated pollutant associated with this modification. Therefore, this modification is not subject to the source modification requirements under 326 IAC 2-7-10.5. The changes will be incorporated into the permit as an Administrative Amendment under 326 IAC 2-7-11 because the permit is amended to revise descriptive information where the revision will not trigger a new applicable requirement or violate a permit term, as described in 326 IAC 2-7-11(a)(7).

**Permit Level Determination – PSD Actual to Projected Actual Test**

The Permittee has provided information, as part of the application for this approval, showing that, based on Actual to Projected Actual (ATPA) test in 326 IAC 2-2-2(d)(3), this modification at a major stationary source will not be major for Prevention of Significant Deterioration under 326 IAC 2-2-1. IDEM, OAQ has reviewed this information and has determined that the ATPA analysis is applicable to this modification and will be part of this approval.

The table below summarizes the ATPA emissions associated with the proposed project.

Process / Emission Unit	Projected Change in Actual Emissions* (ton/yr)									
	PM	PM <sub>10</sub>	PM <sub>2.5</sub> *	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	GHGs (as CO <sub>2</sub> e)	Pb	H <sub>2</sub> SO <sub>4</sub>
Furnace #2	4.69	5.78	5.60	5.80	1.06	1.06	24.97	4,320.56	0.03	1.12
Forehearth and Distributor	0.00	0.01	0.01	0.00	0.01	0.15	0.18	220.96	0.00	-
Annealing Lehrs	0.00	0.01	0.01	0.00	0.00	0.07	0.08	95.78	0.00	-
Mold Swab	1.53	1.53	1.53	-	-	-	-	-	-	-
Hot End Coating	0.23	0.23	0.23	-	-	-	-	-	-	-
Batchhouse	0.00	0.01	0.01	-	-	-	-	-	-	-
Total for Modification	6.45	7.57	7.39	5.80	1.08	1.29	25.23	4,637.30	0.03	1.12
PSD Major Source Thresholds	250	250	250	250	250	250	250	---	250	---
Emission Offset/ Nonattainment NSR Major Source Thresholds	---	NA	NA	NA	NA	NA	NA	---	NA	---
Significant Thresholds	25	15	10	40	40	100	40	75,000 CO <sub>2</sub> e	0.6	7
Subject to Regulation	---	---	---	---	---	---	---	75,000 CO <sub>2</sub> e	---	---

\* The source has elected to use PTE to represent projected actual emissions pursuant to 326 IAC 2-2-1(pp)(2)(B). This conservative methodology causes the calculated Projected Change in Actual Emissions to be larger than the change in emissions that is likely to occur in reality.

\*\*PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.

Based on this analysis, this modification will not be major for Prevention of Significant Deterioration under 326 IAC 2-2-1.

**Federal Rule Applicability Determination**

This modification will not affect the federal rules that have already been determined to be applicable to the source, and no new rules will be triggered due to the change.

**State Rule Applicability Determination**

This modification will not affect the state rules that have already been determined to be applicable to the source, and no new rules will be triggered due to the change.

### Compliance Determination and Monitoring Requirements

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

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

No Compliance Determination Requirements or Compliance Monitoring Requirements will be added or altered with this administrative amendment.

### Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T135-27245-00012. New language appears in **bold**. IDEM model updates have not been included in this administrative amendment but will be included in the source's pending renewal.

**Change No. 1:** Section A.2 - Emission Units and Pollution Control Equipment Summary and Section D.1 - Emissions Unit Operation Conditions of the permit have been revised to reflect the proposed changes to Furnace #2.

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

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

...

- (b) One (1) natural gas-fired glass Furnace, identified as Furnace #2, constructed in 1973 **and approved in 2014 for modification**, with a maximum design melt capacity of 448 tons of glass per day and a maximum pull rate of 390 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST8;

...

...

**SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

...

- (b) One (1) natural gas-fired glass Furnace, identified as Furnace #2, constructed in 1973 **and approved in 2014 for modification**, with a maximum design melt capacity of 448 tons of glass per day and a maximum pull rate of 390 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST8;

...

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

**Conclusion and Recommendation**

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Administrative Amendment No. 135-34777-00012. The staff recommends to the Commissioner that this Part 70 Administrative Amendment be approved.

**IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Michelle Robinson at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-8733 or toll free at 1-800-451-6027 extension 4-8733.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/> .
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations  
Sourcewide PTE Summary**

**Company Name:** Ardagh Glass Inc.  
**Source Address:** 603 East North Street, Winchester, Indiana 47394  
**Permit Number:** 135-34777-00012  
**Source ID:** 135-00012  
**Reviewer:** Michelle Robinson  
**Date:** September, 2014

<b>Uncontrolled/Unlimited Potential to Emit</b>											
<b>Process/Unit</b>	<b>Pollutant</b>										
	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>VOC</b>	<b>CO</b>	<b>GHGs as CO<sub>2</sub>e</b>	<b>Total HAPs</b>	<b>Single Worst HAP</b>	
Furnace #1	87.89	82.87	82.87	213.45	389.24	12.56	12.56	143,066	2.237	2.133	Hexane
<b>Furnace #2 Before Issuance</b>	<b>114.46</b>	<b>107.92</b>	<b>107.92</b>	<b>277.98</b>	<b>506.91</b>	<b>16.35</b>	<b>16.35</b>	<b>51,836</b>	<b>0.810</b>	<b>0.773</b>	<b>Hexane</b>
<b>Furnace #2 After Issuance</b>	<b>114.46</b>	<b>107.92</b>	<b>107.92</b>	<b>277.98</b>	<b>506.91</b>	<b>16.35</b>	<b>16.35</b>	<b>41,469</b>	<b>0.648</b>	<b>0.618</b>	<b>Hexane</b>
Raw Materials Storage & Conveyance	0.657	0.241	0.241	-	-	-	-	-	-	-	-
Raw Materials Mixing	0.657	0.241	0.241	-	-	-	-	-	-	-	-
Furnace #1 Day Bin	0.301	0.110	0.110	-	-	-	-	-	-	-	-
Furnace #2 Day Bin	0.356	0.130	0.130	-	-	-	-	-	-	-	-
Solvent Washers (total of 6)	-	-	-	-	-	25.38	-	-	-	-	-
<b>Total PTE Before Issuance</b>	<b>204.32</b>	<b>191.51</b>	<b>191.51</b>	<b>491.43</b>	<b>896.15</b>	<b>54.29</b>	<b>28.91</b>	<b>194,902</b>	<b>3.047</b>	<b>2.906</b>	<b>Hexane</b>
<b>Total PTE After Issuance</b>	<b>204.32</b>	<b>191.51</b>	<b>191.51</b>	<b>491.43</b>	<b>896.15</b>	<b>54.29</b>	<b>28.91</b>	<b>184,535</b>	<b>2.885</b>	<b>2.751</b>	<b>Hexane</b>

<b>Controlled/Limited Potential to Emit</b>											
<b>Process/Unit</b>	<b>Pollutant</b>										
	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>VOC</b>	<b>CO</b>	<b>GHGs as CO<sub>2</sub>e</b>	<b>Total HAPs</b>	<b>Single Worst HAP</b>	
Furnace #1	87.89	82.87	82.87	213.45	389.24	12.56	12.56	143,066	2.237	2.133	Hexane
<b>Furnace #2 Before Issuance</b>	<b>83.48</b>	<b>93.95</b>	<b>93.95</b>	<b>242.00</b>	<b>441.29</b>	<b>14.24</b>	<b>14.24</b>	<b>51,836</b>	<b>0.810</b>	<b>0.773</b>	<b>Hexane</b>
<b>Furnace #2 After Issuance</b>	<b>83.48</b>	<b>93.95</b>	<b>93.95</b>	<b>242.00</b>	<b>441.29</b>	<b>14.24</b>	<b>14.24</b>	<b>41,469</b>	<b>0.648</b>	<b>0.618</b>	<b>Hexane</b>
Raw Materials Storage & Conveyance	0.657	0.241	0.241	-	-	-	-	-	-	-	-
Raw Materials Mixing	0.131	0.048	0.048	-	-	-	-	-	-	-	-
Furnace #1 Day Bin	0.060	0.022	0.022	-	-	-	-	-	-	-	-
Furnace #2 Day Bin	0.071	0.026	0.026	-	-	-	-	-	-	-	-
Solvent Washers (total of 6)	-	-	-	-	-	25.38	-	-	-	-	-
<b>Total PTE Before Issuance</b>	<b>172.29</b>	<b>177.16</b>	<b>177.16</b>	<b>455.45</b>	<b>830.53</b>	<b>52.18</b>	<b>26.80</b>	<b>194,902</b>	<b>3.047</b>	<b>2.906</b>	<b>Hexane</b>
<b>Total PTE After Issuance</b>	<b>172.29</b>	<b>177.16</b>	<b>177.16</b>	<b>455.45</b>	<b>830.53</b>	<b>52.18</b>	<b>26.80</b>	<b>184,535</b>	<b>2.885</b>	<b>2.751</b>	<b>Hexane</b>

**Notes:**

- As shown in the tables above, there is no increase in the PTE of any regulated pollutant associated with the proposed modification. Therefore, this modification is not subject to the source modification requirements under 326 IAC 2-7-10.5.
- The above PTE calculations are based on the Emissions Summary from Appendix A of the source's 2009 Part 70 Operating Permit Renewal, No. T135-27245-00012, with the additions of potential PM<sub>2.5</sub>, GHG, and HAP emissions where applicable. The Controlled/Limited Potential to Emit PM for Furnace #2 has also been adjusted to reflect the PM emission limit of 19.06 pounds per hour in Section D.1.1 of the permit. Some of the emission factors used in the ATPA calculations in the following pages differ from those used for the source's PTE. This issue will be addressed in Ardagh Glass Inc.'s pending Part 70 Operating Permit Renewal, No. T135-33915-00012.
- PTE PM<sub>2.5</sub> is assumed to be equal to PTE PM<sub>10</sub>.

**Appendix A: Emission Calculations**  
**Actual-to-Projected Actual - Summary of Emissions Increase**

**Company Name: Ardagh Glass Inc.**  
**Source Address: 603 East North Street, Winchester, Indiana 47394**  
**Permit Number: 135-34777-00012**  
**Source ID: 135-00012**  
**Reviewer: Michelle Robinson**  
**Date: September, 2014**

	PM <sub>filterable</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	H <sub>2</sub> SO <sub>4</sub>	VOC	CO	Pb	CO <sub>2e</sub>
<b>Actual to Projected Actual (ATPA) (tpy) Furnace #2</b>										
Baseline	53.58	66.14	63.99	66.34	285.46	12.78	12.17	12.17	0.37	49,401.34
Could Have Accommodated (CHA)	4.39	5.42	5.24	5.43	23.39	1.05	1.00	1.00	0.03	4,047.03
Projected Actuals	62.66	77.34	74.83	77.58	333.81	14.95	14.24	14.24	0.43	57,768.93
ATPA (tpy)	4.69	5.78	5.60	5.80	24.97	1.12	1.06	1.06	0.03	4,320.56
<b>Actual to Projected Actual (ATPA) (tpy) - Forehearth and Distributor</b>										
Baseline	0.04	0.16	0.16	0.01	2.10		0.12	1.77	0.00	2,526.49
Could Have Accommodated (CHA)	0.00	0.01	0.01	0.00	0.17		0.01	0.14	0.00	206.97
Projected Actuals	0.05	0.19	0.19	0.01	2.46		0.14	2.07	0.00	2,954.42
ATPA (tpy)	0.00	0.01	0.01	0.00	0.18		0.01	0.15	0.00	220.96
<b>Actual to Projected Actual (ATPA) (tpy) - Lehrs</b>										
Baseline	0.02	0.07	0.07	0.01	0.91		0.05	0.77	0.00	1,095.14
Could Have Accommodated (CHA)	0.00	0.01	0.01	0.00	0.07		0.00	0.06	0.00	89.72
Projected Actuals	0.02	0.08	0.08	0.01	1.07		0.06	0.90	0.00	1,280.63
ATPA (tpy)	0.00	0.01	0.01	0.00	0.08		0.00	0.07	0.00	95.78
<b>Actual to Projected Actual (ATPA) (tpy) - Mold Swab</b>										
Baseline	17.51	17.51	17.51							
Could Have Accommodated (CHA)	1.43	1.43	1.43							
Projected Actuals	20.48	20.48	20.48							
ATPA (tpy)	1.53	1.53	1.53							
<b>Actual to Projected Actual (ATPA) (tpy) - Hot End Coating</b>										
Baseline	2.61	2.61	2.61							
Could Have Accommodated (CHA)	0.21	0.21	0.21							
Projected Actuals	3.05	3.05	3.05							
ATPA (tpy)	0.23	0.23	0.23							
<b>Actual to Projected Actual (ATPA) (tpy) - Batchhouse</b>										
Baseline	0.01	0.07	0.07							
Could Have Accommodated (CHA)	0.00	0.00	0.00							
Projected Actuals	0.01	0.09	0.08							
ATPA (tpy)	0.00	0.01	0.01							
<b>Actual to Projected Actual (ATPA) (tpy) - Sum of Increases</b>										
ATPA (tpy)	6.45	7.57	7.39	5.80	25.23	1.12	1.08	1.29	0.03	4,637.30
<b>Significant Level (tpy)</b>	<b>25</b>	<b>15</b>	<b>10</b>	<b>40</b>	<b>40</b>	<b>7</b>	<b>40</b>	<b>100</b>	<b>0.6</b>	<b>75,000</b>

\*Gray cells indicate that the specified pollutant is not emitted from this emission unit.

**Appendix A: Emission Calculations**  
**Affected Existing Units - PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, H<sub>2</sub>SO<sub>4</sub>, VOC, CO, Pb**

**Company Name: Ardagh Glass Inc.**  
**Source Address: 603 East North Street, Winchester, Indiana 47394**  
**Permit Number: 135-34777-00012**  
**Source ID: 135-00012**  
**Reviewer: Michelle Robinson**  
**Date: September, 2014**

Assumption: Furnace #2 will operate at its glass pull rate limit of 390 ton/day. Therefore, Projected Actual Emissions for Furnace #2 are equal to limited PTE.

	Glass Pull (tpy)									
		PM <sub>filterable</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	H <sub>2</sub> SO <sub>4</sub>	VOC	CO	Pb
Emission Factors (lb/ton glass) Based on Source Testing & AP-42 (Table 11.15-2, 10/86)		0.88	1.09	1.05	1.09	4.69	0.21	0.20	0.20	0.01
#2 Furnace Baseline (tpy)	121,731	53.58	66.14	63.99	66.34	285.46	12.78	12.17	12.17	0.37
#2 Furnace CHA (tpy)	9,972	4.39	5.42	5.24	5.43	23.39	1.05	1.00	1.00	0.03
#2 Furnace Projected Actuals (tpy)	142,350	62.66	77.34	74.83	77.58	333.81	14.95	14.24	14.24	0.43

Methodology: Emissions (tpy) = glass (tpy) x emission factor (lb/ton glass) x 1/2000 (ton/lbs)

	Natural Gas (MMscf/yr)									
		PM <sub>filterable</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Pb	
Emission Factors (lb/MMscf) AP-42 (Table 1.4-1 & 2, 7/98)		1.90	7.60	7.60	0.60	100.00	5.50	84.00	0.0005	
Forehearth and Distributor Baseline (tpy)	42	0.04	0.16	0.16	0.01	2.10	0.12	1.77	0.00	
Lehrs Baseline (tpy)	18	0.02	0.07	0.07	0.01	0.91	0.05	0.77	0.00	
Forehearth and Distributor CHA (tpy)	3	0.00	0.01	0.01	0.00	0.17	0.01	0.14	0.00	
Lehrs CHA (tpy)	1	0.00	0.01	0.01	0.00	0.07	0.00	0.06	0.00	
Forehearth and Distributor Projected Actuals (tpy)	49	0.05	0.19	0.19	0.01	2.46	0.14	2.07	0.00	
Lehrs Projected Actuals (tpy)	21	0.02	0.08	0.08	0.01	1.07	0.06	0.90	0.00	

Methodology: Emissions (tpy) = N. Gas (MMscf) x emission factor (lb/MMscf) x 1/2000 (ton/lbs)

	Material (lb/yr)									
		PM <sub>filterable</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Pb	
Mold Swab Emission Factor (lb/lb material)		0.90	0.90	0.90						
Hot End Emission Factor (lb/lb material)		0.49	0.49	0.49						
Mold Swab Baseline (tpy)	38,916	17.51	17.51	17.51						
Hot End Coating Baseline (tpy)	10,634	2.61	2.61	2.61						
Mold Swab CHA (tpy)	3,188	1.43	1.43	1.43						
Hot End Coating CHA (tpy)	871	0.21	0.21	0.21						
Mold Swab Projected Actuals (tpy)	45,508	20.48	20.48	20.48						
Hot End Coating Projected Actuals (tpy)	12,435	3.05	3.05	3.05						

Methodology: Emissions (tpy) = material (tpy) x emission factor (lb/ton material) x 1/2000 (ton/lbs)

	Material (tpy)									
		PM <sub>filterable</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Pb	
Emission Factors (lb/ton material)		1.50E-05	9.28E-05	9.06E-05						
Furnace #2 Day Bin Baseline (tpy)	142,766	0.00	0.01	0.01						
Furnace #2 Day Bin CHA (tpy)	11,696	0.00	0.00	0.00						
Furnace #2 Day Bin Projected Actuals (tpy)	166,947	0.00	0.02	0.02						

Methodology: Emissions (tpy) = material (tpy) x 2 drop points x emission factor (lb/ton material) x 1/2000 (ton/lbs)

	Material (tpy)									
		PM <sub>filterable</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Pb	
Emission Factors (lb/ton material)		1.50E-05	9.28E-05	9.06E-05						
Batch Storage and Conveyance Baseline (tpy)	142,766	0.00	0.01	0.01						
Batch Storage and Conveyance CHA (tpy)	11,696	0.00	0.00	0.00						
Batch Storage and Conveyance Projected Actuals (tpy)	166,947	0.00	0.02	0.02						

Methodology: Emissions (tpy) = material (tpy) x 2 drop points x emission factor (lb/ton material) x 1/2000 (ton/lbs)

	Material (tpy)									
		PM <sub>filterable</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Pb	
Emission Factors (lb/ton material)		1.50E-05	9.28E-05	9.06E-05						
Batch Mixing Baseline (tpy)	142,766	0.01	0.03	0.03						
Batch Mixing CHA (tpy)	11,696	0.00	0.00	0.00						
Batch Mixing Projected Actuals (tpy)	166,947	0.01	0.04	0.04						

Methodology: Emissions (tpy) = material (tpy) x 5 drop points x emission factor (lb/ton material) x 1/2000 (ton/lbs)

	Material (tpy)									
		PM <sub>filterable</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Pb	
Emission Factors (lb/ton material)		2.70E-05	2.02E-04	1.98E-04						
Cullet Crushing Baseline (tpy)	10,874	0.00	0.01	0.01						
Cullet Crushing CHA (tpy)	891	0.00	0.00	0.00						
Cullet Crushing Projected Actuals (tpy)	12,716	0.00	0.02	0.02						

Methodology: Emissions (tpy) = material (tpy) x 1 drop point x emission factor (lb/ton material) x 1/2000 (ton/lbs)

**Appendix A: Emission Calculations  
Affected Existing Units - GHG**

**Company Name:** Ardagh Glass Inc.  
**Source Address:** 603 East North Street, Winchester, Indiana 47394  
**Permit Number:** 135-34777-00012  
**Source ID:** 135-00012  
**Reviewer:** Michelle Robinson  
**Date:** September, 2014

Emission Factors:	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
kg/MMBtu	53.06	0.001	0.0001
Mton/Mton limestone	0.440	0	0
Mton/Mton dolomite	0.477	0	0
Mton/Mton soda ash	0.415	0	0

Furnace No. 2 - Baseline	Throughput	Units	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
<sup>(1)</sup> natural gas usage	493,831	MMBtu/yr	26,202.69	0.49	0.05
<sup>(2)</sup> limestone usage	12,232	ton/yr	4,881.62	0.00	0.00
<sup>(2)</sup> dolomite usage	8,945	ton/yr	3,869.90	0.00	0.00
<sup>(2)</sup> soda ash usage	26,107	ton/yr	9,827.20	0.00	0.00
Furnace No. 2 Baseline (Mton/yr) =			44,781.41	0.49	0.05
<b>Furnace No. 2 Baseline (tpy) =</b>			<b>49,371.51</b>	<b>0.54</b>	<b>0.05</b>

Furnace No. 2 - Baseline		
Compound	GWP	Resultant
CO <sub>2</sub>	1	49,371.51
CH <sub>4</sub>	25	13.61
N <sub>2</sub> O	298	16.22

<sup>(3)</sup> CO<sub>2</sub>e Baseline (tpy) = 49,401.34

Furnace No. 2 - Could Have Accommodated (CHA)	Throughput	Units	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
<sup>(1)</sup> natural gas usage	40,455	MMBtu/yr	2,146.56	0.04	0.00
<sup>(2)</sup> limestone usage	1,002	ton/yr	399.91	0.00	0.00
<sup>(2)</sup> dolomite usage	733	ton/yr	317.03	0.00	0.00
<sup>(2)</sup> soda ash usage	2,139	ton/yr	805.06	0.00	0.00
Furnace No. 2 CHA (Mton/yr) =			3,668.56	0.04	0.004
<b>Furnace No. 2 CHA (tpy) =</b>			<b>4,044.59</b>	<b>0.04</b>	<b>0.004</b>

Furnace No. 2 - (CHA) Could Have Accommodated		
Compound	GWP	Resultant
CO <sub>2</sub>	1	4,044.59
CH <sub>4</sub>	25	1.12
N <sub>2</sub> O	298	1.33

<sup>(3)</sup> CO<sub>2</sub>e CHA (tpy) = 4,047.03

Furnace No. 2 - Projected Actuals	Throughput	Units	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
<sup>(1)</sup> natural gas usage	577,476	MMBtu/yr	30,640.89	0.58	0.06
<sup>(2)</sup> limestone usage	14,304	ton/yr	5,708.47	0.00	0.00
<sup>(2)</sup> dolomite usage	10,460	ton/yr	4,525.38	0.00	0.00
<sup>(2)</sup> soda ash usage	30,529	ton/yr	11,491.73	0.00	0.00
Furnace No. 2 Projected Actuals (Mton/yr) =			52,366.47	0.58	0.06
<b>Furnace No. 2 Projected Actuals (tpy) =</b>			<b>57,734.04</b>	<b>0.64</b>	<b>0.064</b>

Furnace No. 2 - Projected Actuals		
Compound	GWP	Resultant
CO <sub>2</sub>	1	57,734.04
CH <sub>4</sub>	25	15.92
N <sub>2</sub> O	298	18.97

<sup>(3)</sup> CO<sub>2</sub>e Projected Actuals (tpy) = 57,768.93

**Notes:**

- Emission factors for N.G. combustion are from 40 CFR 98 Subpart C (General Fuel Stationary Combustion Sources).
- Emission factors for carbonate based raw material usage are from 40 CFR 98 Subpart N (Glass Production) and the following calculation:

$$E.F. (Mton/Mton \text{ material}) = \text{summation} [ MFi \times (Mi \times 2000 \text{ Mton}/2205 \text{ ton}) \times EFi \times Fi ]$$

Where:

- MFi = Annual average mass fraction of carbonate-base mineral i in carbonate-based raw material i (% , expressed as a decimal). Per, 40 CFR 98.143 (c) can use a value of 1.
- Mi = Annual amount of carbonate-based raw material i charged to furnace (tons).
- EFi = Emission factor for carbonate-based raw material i (metric ton CO<sub>2</sub> per metric ton carbonate-based raw material, as shown in Table N-1 to this subpart).  
 EFi (limestone) = 0.440, EFi (dolomite) = 0.440, EFi (soda ash) = 0.415
- Fi = Fraction of calcination achieved for carbonate-based raw material i, assumed to be equal to 1.0 (percentage, expressed as a decimal).

**Appendix A: Emission Calculations  
Affected Existing Units - GHG, cont.**

**Company Name:** Ardagh Glass Inc.  
**Source Address:** 603 East North Street, Winchester, Indiana 47394  
**Permit Number:** 135-34777-00012  
**Source ID:** 135-00012  
**Reviewer:** Michelle Robinson  
**Date:** September, 2014

Forehearth and Distributor - Baseline	Throughput (MMscf/yr)	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
<sup>(4)</sup> natural gas usage	42	2,289.23	0.04	0.00
Forehearth and Distributor Baseline (Mton/yr) =		2,289.23	4.31E-02	4.31E-03
<b>Forehearth and Distributor Baseline (tpy) =</b>		<b>2,523.88</b>	<b>4.76E-02</b>	<b>4.76E-03</b>

Forehearth and Distributor - Could Have Accommodated (CHA)	Throughput (MMscf/yr)	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
<sup>(4)</sup> natural gas usage	3	187.54	3.53E-03	3.53E-04
Forehearth and Distributor CHA (Mton/yr) =		187.54	3.53E-03	3.53E-04
<b>Forehearth and Distributor CHA (tpy) =</b>		<b>206.76</b>	<b>3.90E-03</b>	<b>3.90E-04</b>

Forehearth and Distributor - Projected Actuals	Throughput (MMscf/yr)	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
<sup>(4)</sup> natural gas usage	49	2,676.98	5.05E-02	5.05E-03
Forehearth and Distributor Proj. Actuals (Mton/yr) =		2,676.98	5.05E-02	5.05E-03
<b>Forehearth and Distributor Projected Actuals (tpy) =</b>		<b>2,951.38</b>	<b>5.56E-02</b>	<b>5.56E-03</b>

Lehrs - Baseline	Throughput (MMscf/yr)	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
<sup>(4)</sup> natural gas usage	18	992.29	1.87E-02	1.87E-03
Lehrs Baseline (Mton/yr) =		992.29	1.87E-02	1.87E-03
<b>Lehrs Baseline (tpy) =</b>		<b>1,094.01</b>	<b>2.06E-02</b>	<b>2.06E-03</b>

Lehrs - Could Have Accommodated (CHA)	Throughput (MMscf/yr)	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
<sup>(4)</sup> natural gas usage	1	81.29	1.53E-03	1.53E-04
Lehrs CHA (Mton/yr) =		81.29	1.53E-03	1.53E-04
<b>Lehrs CHA (tpy) =</b>		<b>89.62</b>	<b>1.69E-03</b>	<b>1.69E-04</b>

Lehrs - Projected Actuals	Throughput (MMscf/yr)	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
<sup>(4)</sup> natural gas usage	21	1,160.37	2.19E-02	2.19E-03
Lehrs Projected Actuals (Mton/yr) =		1,160.37	2.19E-02	2.19E-03
<b>Lehrs Projected Actuals (tpy) =</b>		<b>1,279.31</b>	<b>2.41E-02</b>	<b>2.41E-03</b>

Distributor - Baseline			
Compound	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
GWP	1	25	298
Resultant	2,523.88	1.19	1.42
<sup>(3)</sup> CO <sub>2</sub> e Baseline (tpy) = <b>2,526.49</b>			

Distributor - CHA			
Compound	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
GWP	1	25	298
Resultant	206.76	9.74E-02	1.16E-01
<sup>(3)</sup> CO <sub>2</sub> e CHA (tpy) = <b>206.97</b>			

Distributor - Projected Actuals			
Compound	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
GWP	1	25	298
Resultant	2,951.38	1.39E+00	1.66E+00
<sup>(3)</sup> CO <sub>2</sub> e Projected Actuals (tpy) = <b>2,954.42</b>			

Lehrs - Baseline			
Compound	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
GWP	1	25	298
Resultant	1,094.01	5.15E-01	6.14E-01
<sup>(3)</sup> CO <sub>2</sub> e Baseline (tpy) = <b>1,095.14</b>			

Lehrs - CHA			
Compound	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
GWP	1	25	298
Resultant	89.62	4.22E-02	5.03E-02
<sup>(3)</sup> CO <sub>2</sub> e CHA (tpy) = <b>89.72</b>			

Lehrs - Projected Actuals			
Compound	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
GWP	1	25	298
Resultant	1,279.31	6.03E-01	7.18E-01
<sup>(3)</sup> CO <sub>2</sub> e Projected Actuals (tpy) = <b>1,280.63</b>			

Methodology:

GWP = Global Warming Potential (unitless) (40 CFR 98, Subpart A, Table A-1)

Mton = Metric ton

Emissions factors from 40 CFR 98 Subparts C (General Fuel Stationary Combustion Sources) and N (Glass Production)

<sup>(1)</sup> Emissions (Mton/yr) = [N.G. Usage (MMBtu/yr) x E.F. (kg/MMBtu) x 1.0E-3 (Mton/kg)]

<sup>(2)</sup> Emissions (Mton/yr) = [Material Throughput (ton/yr) x 2,000/2,205 (Mton/ton) x E.F. (Mton Emissions/Mton Material)]

Emissions (tpy) = Emissions Mton/yr x 2,205 ton/2,000 Mton

<sup>(3)</sup> Emissions CO<sub>2</sub>e = Summation of the Resultants [Emissions Compound (tpy) x GWP] (Pursuant to 40 CFR 52.21(b)(49)(ii)(a))

<sup>(4)</sup> Emissions (Mton/yr) = [1.0E-3 Mton/kg x N.G. Usage (MMscf/yr) x 1,000,000 (scf/MMscf) x HHV (MMBtu/scf) x E.F. (kg/MMBtu)]

Where:

HHV (High Heating Value) = 1.026E-03 MMBtu/scf

1,000 scf N.G. = 1.0 MMBtu

**Appendix A: Emission Calculations  
Furnace #2 NSR Pollutants (Baseline 2012-2013)**

**Company Name:** Ardagh Glass Inc.  
**Source Address:** 603 East North Street, Winchester, Indiana 47394  
**Permit Number:** 135-34777-00012  
**Source ID:** 135-00012  
**Reviewer:** Michelle Robinson  
**Date:** September, 2014

Period	Glass pull <sup>1</sup> (tons)	Natural gas usage <sup>1</sup> (Mscf)	Hours of operation (hr/yr)
Baseline (2-yr)	243,462	962,634	8,760
Annualized (1-yr)	121,731	481,317	8,760

<sup>1</sup>Glass pull and natural gas usage provided by source.

Pollutant	Emission Rate (lb/ton)	Emissions (tpy)	Emissions (lb/hr)
CO <sup>2</sup>	0.2000	12.17	2.78
NO <sub>x</sub> <sup>3</sup>	4.69	285.46	65.17
PM <sup>3</sup>	0.8803	53.58	12.23
PM <sub>10</sub> <sup>4</sup>	1.0866	66.14	15.10
PM <sub>2.5</sub> <sup>4</sup>	1.0514	63.99	14.61
SO <sub>2</sub> <sup>3</sup>	1.09	66.34	15.15
VOC <sup>2</sup>	0.2000	12.17	2.78
Pb <sup>5</sup>	0.0061	0.37	0.08
H <sub>2</sub> SO <sub>4</sub> <sup>6</sup>	0.2100	12.78	2.92
Pollutant	Emission factor (lb/MMscf)	Emissions (tpy)	Emissions (lb/hr)
NH <sub>3</sub> <sup>7</sup>	3.2	0.77	0.18

<sup>2</sup>Emission factor for uncontrolled melting furnace per AP-42, Section 11.15, Table 11.15-2 (10/86).

<sup>3</sup>Emission factor determined from *No. 1 and 2 Glass Melting Furnaces Emissions Measurements and Observations Report (1/15/2014)* provided by Ryan Ponting via email on 6/13/2014.

<sup>4</sup>Emission rates derived from filterable PM stack test results per the EPA PM calculator database for an uncontrolled container glass melting furnace (SCC 30501402):

	Ratio (%)
PM <sub>10</sub> (filt)/PM(filt)	95
PM <sub>2.5</sub> (filt)/PM(filt)	91
PM(cond)/PM <sub>10</sub> (filt)	29.93

Pollutant emission rates are then:

Pollutant	Emission Rate (lb/ton)
PM(filt)	0.88
PM <sub>10</sub> (filt)	0.84
PM <sub>2.5</sub> (filt)	0.80
PM(cond)	0.25

PM<sub>10</sub> and PM<sub>2.5</sub> are considered to contain condensible PM.

<sup>5</sup>Emission factor from stack tests performed on Saint-Gobain Containers, Inc., furnaces, compiled by ENVIRON, and released in a 3/07/2014 memo.

<sup>6</sup>Fleetwide emission factor provided by Amy Sperback via email on 7/8/2014.

<sup>7</sup>Emission factor of 3.2 lb/MMscf for uncontrolled natural gas combustion from EPA FIRE database.

**Appendix A: Emission Calculations  
Furnace #2 GHG (Baseline 2012-2013)**

**Company Name:** Ardagh Glass Inc.  
**Source Address:** 603 East North Street, Winchester, Indiana 47394  
**Permit Number:** 135-34777-00012  
**Source ID:** 135-00012  
**Reviewer:** Michelle Robinson  
**Date:** September, 2014

Pollutant	Subpart C <sup>1</sup> Natural Gas Combustion (kg/MMBtu)	Subpart N EFi <sup>2</sup>		
		Limestone CaCO <sub>3</sub> (metric tons CO <sub>2</sub> /metric ton of material)	Dolomite CaMg(CO <sub>3</sub> ) <sub>2</sub>	Sodium Carbonate/Soda Ash
CO <sub>2</sub>	53.06	0.44	0.477	0.415
CH <sub>4</sub>	1.00E-03	--	--	--
N <sub>2</sub> O	1.00E-04	--	--	--

<sup>1</sup>GHG emission factors from 40 CFR Part 98 Subpart C, Tables C-1 and C-2 for Natural Gas and facility provided HHV of 1.026 x 10<sup>-3</sup> MMBtu/scf.

<sup>2</sup>Calculation is as follows:

Emissions of CO<sub>2</sub> = Summation [MFi \* (Mi \* 2000/2205) \* EFi \* Fi]

MFi Annual average mass fraction of carbonate-based mineral i in carbonate based raw material;  
Per 98.143(c), can use a value of 1

Mi Annual amount of carbonate-based raw material i charged (tons)

Fi Fraction of calcination achieved for carbonate based raw material, i, assumed to be 1.0

Period	Natural Gas Usage <sup>3</sup> (Mscf)	Raw Material Usage <sup>4</sup>			Hours of operation (hr/yr)
		Limestone	Dolomite (ton)	Soda Ash	
Baseline (2-yr)	962,634	24,464	17,889	52,214	8,760
Annualized (1-yr)	481,317	12,232	8,945	26,107	8,760

<sup>3</sup>Natural gas usage provided by Ryan Ponting via email on 6/27/14.

<sup>4</sup>Raw material throughputs provided by Ryan Ponting via email on 6/27/2014.

Pollutant	Natural Gas Usage Emissions <sup>5</sup>		Raw Material Usage Emissions	
	(tpy)	(lb/hr)	(tpy)	(lb/hr)
CO <sub>2</sub>	28,884	6,594	20,483	4,676
CH <sub>4</sub>	0.54	0.12	--	--
N <sub>2</sub> O	0.05	0.01	--	--

<sup>5</sup>Assumed a natural gas heat content of 1.026 x 10<sup>-3</sup> MMBtu/scf (40 CFR 98 Subpart C).

**Appendix A: Emission Calculations**  
**Furnace #2 Distributor, Forehearth, and Lehrs (Baseline 2012-2013)**

**Company Name:** Ardagh Glass Inc.  
**Source Address:** 603 East North Street, Winchester, Indiana 47394  
**Permit Number:** 135-34777-00012  
**Source ID:** 135-00012  
**Reviewer:** Michelle Robinson  
**Date:** September, 2014

Period	Natural gas usage <sup>1</sup>		Hours of operation
	Lehrs (Mscf)	Forehearth and Distributor (Mscf)	(hr/yr)
Baseline (2-yr)	36,455	84,102	8,760
Annualized (1-yr)	18,227	42,051	8,760

<sup>1</sup>Natural gas usage provided by Ryan Ponting via email on 6/27/14. Specific NG usage by the lehrs and the forehearth and distributor for Furnace #2 determined through a ratio of Furnace #2 NG usage to combined Furnace #1 and #2 NG usage.

Pollutant	Emission Rate <sup>2</sup> (lb/MMscf)	Emission Rate <sup>3</sup> (kg/MMBtu)	Lehrs		Forehearth and Distributor	
			Emissions <sup>4</sup> (tpy)	Emissions (lb/hr)	Emissions <sup>4</sup> (tpy)	Emissions (lb/hr)
CO	84	--	0.77	0.17	1.77	0.40
NO <sub>x</sub>	100	--	0.91	0.21	2.10	0.48
PM/PM <sub>10</sub> /PM <sub>2.5</sub> <sup>5</sup>	7.6	--	0.07	0.02	0.16	0.04
PM <sub>filterable</sub>	1.9	--	0.02	0.00	0.04	0.01
SO <sub>2</sub>	0.6	--	0.01	1.25E-03	0.01	2.88E-03
VOC	5.5	--	0.05	0.01	0.12	0.03
Pb	0.0005	--	4.56E-06	1.04E-06	1.05E-05	2.40E-06
NH <sub>3</sub> <sup>6</sup>	3.2	--	0.03	6.66E-03	0.07	1.54E-02
CO <sub>2</sub>	--	53.02	1,093	250	2,522	576
CH <sub>4</sub>	--	1.00E-03	0.02	4.71E-03	0.05	1.09E-02
N <sub>2</sub> O	--	1.00E-04	2.06E-03	4.71E-04	4.76E-03	1.09E-03

<sup>2</sup>Emission factors per AP-42, Section 1.4, Tables 1.4-1 for an uncontrolled small boiler and 1.4-2 (7/98).

<sup>3</sup>GHG Emission factors from 40 CFR Part 98 Subpart C, Tables C-1 and C-2 for Natural Gas.

<sup>4</sup>Assumed a natural gas heat content of 1.026 x 10<sup>-3</sup> MMBtu/scf (40 CFR 98 Subpart C).

<sup>5</sup>AP-42 Table 1.4-2, 7/98, notes that all PM is assumed to be less than 1 µm in diameter.

<sup>6</sup>Emission factor of 3.2 lb/MMscf for natural gas combustion from EPA FIRE database.

**Appendix A: Emission Calculations  
Batch House (Baseline 2012-2013)**

**Company Name:** Ardagh Glass Inc.  
**Source Address:** 603 East North Street, Winchester, Indiana 47394  
**Permit Number:** 135-34777-00012  
**Source ID:** 135-00012  
**Reviewer:** Michelle Robinson  
**Date:** September, 2014

Emission Unit	Emission Unit	Control Device <sup>1</sup>	Hours of Operation (hr)	Number of Drop Points <sup>2</sup>	Material	Throughput <sup>3</sup>		TSP Emissions (tpy)	PM <sub>10</sub> Emissions (tpy)	PM <sub>2.5</sub> Emissions (tpy)
						(ton/Baseline Period)	(tpy)			
D.1	Furnace #1 Day Bin (baghouse)	BH3 (ST5)	8760	2	Sand	110,728	55,364	0.0057	0.0051	0.0050
					Cullet	48,728	24,364	0.0025	0.0023	0.0022
					Limestone	17,434	8,717	0.0009	0.0008	0.0008
					Soda Ash	37,194	18,597	0.0019	0.0017	0.0017
					Unclassified	22,511	11,256	0.0012	0.0010	0.0010
					<b>Total</b>	<b>236,595</b>	<b>118,297</b>	<b>0.0121</b>	<b>0.0110</b>	<b>0.0107</b>
D.1	Furnace #2 Day Bin (baghouse)	BH4 (ST6)	8760	2	Sand	155,416	77,708	0.0079	0.0072	0.0070
					Cullet	21,749	10,874	0.0011	0.0010	0.0010
					Limestone	24,464	12,232	0.0013	0.0011	0.0011
					Soda Ash	52,214	26,107	0.0027	0.0024	0.0024
					Unclassified	31,689	15,844	0.0016	0.0015	0.0014
					<b>Total</b>	<b>285,531</b>	<b>142,766</b>	<b>0.0146</b>	<b>0.0132</b>	<b>0.0129</b>
D.2	Batch Storage and Conveyance (baghouse)	Exhausts to baghouse	8760	2	Sand	266,144	133,072	0.0136	0.0123	0.0121
					Cullet	70,477	35,239	0.0036	0.0033	0.0032
					Limestone	41,897	20,949	0.0021	0.0019	0.0019
					Soda Ash	89,409	44,704	0.0046	0.0041	0.0040
					Unclassified	54,200	27,100	0.0028	0.0025	0.0025
					<b>Total</b>	<b>522,126</b>	<b>261,063</b>	<b>0.0267</b>	<b>0.0242</b>	<b>0.0236</b>
D.2	Batch Mixing (2 baghouses)	BH1 (ST9), BH2 (Indoors)	8760	5	Sand	266,144	133,072	0.0340	0.0309	0.0301
					Cullet	70,477	35,239	0.0090	0.0082	0.0080
					Limestone	41,897	20,949	0.0054	0.0049	0.0047
					Soda Ash	89,409	44,704	0.0114	0.0104	0.0101
					Unclassified	54,200	27,100	0.0069	0.0063	0.0061
					<b>Total</b>	<b>522,126</b>	<b>261,063</b>	<b>0.0668</b>	<b>0.0606</b>	<b>0.0591</b>
D.2	Cullet Crushing	Indoors	8760	1	Total Cullet	70,477	35,239	0.0038	0.0036	0.0035
<b>Total (tpy):</b>								<b>0.1240</b>	<b>0.1126</b>	<b>0.1099</b>

<sup>1</sup>If batch house process vents indoors, process emissions are assumed to be controlled.

<sup>2</sup>Number of drop points obtained from Ardagh.

<sup>3</sup>Raw material throughputs provided by Ryan Ponting via email on 6/27/2014.

AP-42 Emission Factor Source <sup>4</sup>	Corresponding Ardagh Source	Uncontrolled Total PM Emission Factor (lb/ton)	Controlled Total PM Emission Factor <sup>5</sup> (lb/ton)	Uncontrolled Filterable PM <sub>10</sub> Emission Factor (lb/ton)	Controlled Filterable PM <sub>10</sub> Emission Factor <sup>5</sup> (lb/ton)	Uncontrolled Filterable PM <sub>2.5</sub> Emission Factor <sup>6</sup> (lb/ton)	Controlled Filterable PM <sub>2.5</sub> Emission Factor <sup>5</sup> (lb/ton)	Uncontrolled Condensable PM Emission Factor <sup>6</sup> (lb/ton)
Truck Loading-Conveyor, crushed stone (SCC 3-05-020-32)	Material Storage Bins	No Data	No Data	1.00E-04	5.00E-07	3.53E-05	3.53E-07	7.94E-06
Conveyor Transfer Point (SCC 3-05-020-06)	Conveyor Drop Points	3.00E-03	1.50E-05	1.10E-03	5.50E-06	3.26E-04	3.26E-06	8.73E-05
Tertiary Crushing (SCC 3-05-020-03)	Mixers	5.40E-03	2.70E-05	2.40E-03	1.20E-05	7.06E-04	7.06E-06	1.90E-04

<sup>4</sup>Emission factors from AP-42, Section 11.19.2, Table 11.19.2-2.

<sup>5</sup>Low temperature fabric filters; Control efficiencies obtained from AP-42, Appendix B-2, Table B.2-3: PM<sub>10</sub> - 99.5%; PM<sub>2.5</sub> - 99%; not applicable to condensable PM

<sup>6</sup>Emission factor ratios from EPA's PM calculator:

PM <sub>2.5</sub> /PM <sub>10</sub> ratio	
SCC 3-05-020-32	0.352941176
SCC 3-05-020-06	0.295918367
SCC 3-05-020-03	0.294117647

PM <sub>condensable</sub> /PM <sub>10 filterable</sub> ratio	
SCC 3-05-020-32	0.079365079
SCC 3-05-020-06	0.079365079
SCC 3-05-020-03	0.079365079

**Appendix A: Emission Calculations  
Mold Swabbing (Baseline 2012-2013)**

**Company Name:** Ardagh Glass Inc.  
**Source Address:** 603 East North Street, Winchester, Indiana 47394  
**Permit Number:** 135-34777-00012  
**Source ID:** 135-00012  
**Reviewer:** Michelle Robinson  
**Date:** September, 2014

Product	Density <sup>1</sup> (g/cm <sup>3</sup> )	Total Usage <sup>2</sup>	
		(gal/Baseline Period)	(lb/Baseline Period)
Molac TM	1	102	851
Ring Dope 46	0.99	1,017	8,400
Kleenmold 170	1	10,317	86,100
Total Regnis 320 XL	1	5,775	48,195
Glass Flow Gold	1	33	275
Total	--	17,244	143,821

<sup>1</sup>Density determined per MSDSs provided by Ryan Ponting via email on 6/20/2014.

<sup>2</sup>Mold swabbing compound usage provided by Ryan Ponting via email on 7/7/14.

Hours of Operation		Glass Pull <sup>3</sup>		Product Usage <sup>4</sup>	
Furnace #1 (hr/yr)	Furnace #2 (hr/yr)	Furnace #1 (lb/Baseline Period)	Furnace #2 (lb/Baseline Period)	Furnace #1 lb/yr	Furnace #2 lb/yr
8,760	8,760	206,416	243,462	32,994	38,916

<sup>3</sup>Glass pull provided by Ryan Ponting via email on 6/27/14.

<sup>4</sup>Furnace #1

136,429 lb Mold Swabbing Product	206,416 lb F2 Pull/Baseline Period	Baseline Period	= 31,299 lb/yr
Baseline Period	(206,416 + 243,462) lb Total Pull/Baseline Period	2 yr	

Furnace #2

136,429 lb Mold Swabbing Product	243,462 lb F2 Pull/Baseline Period	Baseline Period	= 36,916 lb/yr
Baseline Period	(206,416 + 243,462) lb Total Pull/Baseline Period	2 yr	

Pollutant	Petroleum Carrier Constituent <sup>5</sup> %	Furnace #1 Emissions		Furnace #2 Emissions	
		(tpy)	(lbs/hr)	(tpy)	(lbs/hr)
PM/PM <sub>10</sub> /PM <sub>2.5</sub> <sup>6</sup>	90	14.8	3.4	17.5	3.4

<sup>5</sup>Per "Mold Swab Hot End Coating Emission Factors.xls" provided in 5/7/11 email from Robert A. Metzger, mold swab is about 90% petroleum carrier which is assumed to be emitted as smoke (PM) and the remaining 10% is other constituents which adhere to the molds and bottles.

<sup>6</sup>PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions (tpy):

Furnace #1:

31,299 lb Product	ton	90% Petroleum Carrier = 14.1 tpy
yr	2000 lb	

Furnace #2:

36,916 lb Product	ton	90% Petroleum Carrier = 16.6 tpy
yr	2000 lb	

**Appendix A: Emission Calculations  
Hot End Treatment (Baseline 2012-2013)**

**Company Name:** Ardagh Glass Inc.  
**Source Address:** 603 East North Street, Winchester, Indiana 47394  
**Permit Number:** 135-34777-00012  
**Source ID:** 135-00012  
**Reviewer:** Michelle Robinson  
**Date:** September, 2014

<b>TC100 Certincoat Usage<sup>1</sup></b> (lb/Baseline Period)	<b>PM/PM<sub>10</sub>/PM<sub>2.5</sub> Filterable Wt. % in Product<sup>2</sup></b> (%)	<b>HCl Emission Factor<sup>3</sup></b> (%)
39,300	49	21

<sup>1</sup>TC100 usage provided by Ryan Ponting via email on 7/7/14.

<sup>2</sup>Emission factor based on vendor data. For old style hoods, a PM factor of 49% was used.

<sup>3</sup>Emission factors utilized at similar Ardagh Glass facilities indicate that HCl emissions are 21% of TC100 usage.

<b>Hours of Operation</b>			<b>Glass Pull<sup>4</sup></b>		<b>TC100 Usage<sup>5</sup></b>	
<b>Furnace #1</b> (hr/yr)	<b>Furnace #2</b> (hr/yr)	<b>Average</b> (hr/yr)	<b>Furnace #1</b> (lb/Baseline Period)	<b>Furnace #2</b> (lb/Baseline Period)	<b>Furnace #1</b> lb/yr	<b>Furnace #2</b> lb/yr
8,760	8,760	8,760	206,416	243,462	9,016	10,634

<sup>4</sup>Glass pull provided by Ryan Ponting via email on 6/27/14.

<sup>5</sup>Furnace #1:

39,300 lb TC100 Usage	206,416 lb F2 Pull/Baseline Period	Baseline Period	= 9,016 lb/yr
Baseline Period	(206,416 + 243,462) lb Total Pull/Baseline Period	2 yr	

Furnace #2:

39,300 lb TC100 Usage	243,462 lb F2 Pull/Baseline Period	Baseline Period	= 10,634 lb/yr
Baseline Period	(206,416 + 243,462) lb Total Pull/Baseline Period	2 yr	

<b>Pollutant</b>	<b>Furnace #1 Emissions</b>		<b>Furnace #2 Emissions</b>	
	(tpy)	(lb/hr)	(tpy)	(lb/hr)
PM/PM <sub>10</sub> /PM <sub>2.5</sub> <sup>6</sup>	2.2	0.50	2.6	0.59
HCl <sup>7</sup>	0.9	0.22	1.1	0.25

<sup>6</sup>PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions (tpy):

Furnace #1:

9,016 lb F1 TC100 Usage	ton	49% PM/PM <sub>10</sub> /PM <sub>2.5</sub>	= 2.2 tpy
Baseline Period	2000 lb		

Furnace #2:

10,634 lb F2 TC100 Usage	ton	49% PM/PM <sub>10</sub> /PM <sub>2.5</sub>	= 2.6 tpy
Baseline Period	2000 lb		

<sup>7</sup>HCl emissions (tpy):

Furnace #1:

9,016 lb F1 TC100 Usage	ton	21% HCl	= 0.9 tpy
yr	2000 lb		

Furnace #2:

10,634 lb F2 TC100 Usage	ton	21% HCl	= 0.25 tpy
yr	2000 lb		



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

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

**TO:** Gary Jarrett  
Ardagh Glass Inc  
603 East North Street  
Winchester, Indiana 47394

**DATE:** November 3, 2014

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

**SUBJECT:** Final Decision  
Title V Administrative Amendment  
135-34777-00012

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:  
Tony Schroeder (Trinity Consultants)  
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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 6/13/2013

# Mail Code 61-53

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2		Randolph County Commissioners 100 South Main Street Winchester IN 47394 (Local Official)									
3		Winchester City Council and Mayors Office 113 E. Wahington Street Winchester IN 47394 (Local Official)									
4		Randolph County Health Department 325 S. Oak St Winchester IN 47394 (Health Department)									
5		Tony Schroeder Trinity Consultants 7330 Woodland Drive Suite 225 Indianapolis Indiana 46278 (Consultant)									
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