



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: August 20, 2014

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

Source Name: NEWCO DT, Inc.

Permit Level: Registration Administrative Amendment

Permit Number: 085-34808-00055

Source Location: State Road 15 North and Poor Drive, Warsaw, Indiana

Type of Action Taken: Changes that are administrative in nature

Notice of Decision: Approval

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

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 34808.

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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August 20, 2014

Timothy R. Foster
NEWCO DT, Inc.
P.O. Box 1017
Warsaw, IN 46581

Re: 085-34808-00055
Administrative Amendment to
R085-12667-00055

Dear Mr. Foster:

Indiana Coated Fabrics, Inc. was issued Registration No. R085-12667-00055 on November 28, 2000 for a stationary coating and laminated window shade and projection screen manufacturing plant located at State Road 15 North and Poor Drive, Warsaw, IN. On August 6, 2014, the Office of Air Quality (OAQ) received an application from the source requesting the following changes to its registration:

1. Change the owning and operating entity from Indiana Coated Fabrics Inc. to NEWCO DT, Inc. effective July 31, 2014.
2. Change descriptive information to reflect the removal of the one (1) DOTP holding tank with a capacity of 1,500 gallons.

Pursuant to 326 IAC 2-5.5-6(d)(3), the source name change in the registration is considered an administrative amendment because the registration is amended to indicate a change in ownership, company name or operational control of the source.

Pursuant to 326 IAC 2-5.5-6(d)(2)(B), the removal of the one (1) DOTP holding tank is considered an administrative amendment because the registration is amended to indicate changes in descriptive information concerning the source or emission units. The uncontrolled/unlimited potential to emit of the entire source after the removal of this emission unit will continue to be within the threshold levels specified in 326 IAC 2-5.5-1(b)(1) (Registration). See Appendix A to the registration for the revised potential to emit (PTE) of the source after the removal of the existing emission unit.

The source shall continue to operate according to 326 IAC 2-5.5 (Registrations). All other conditions of the registration shall remain unchanged and in effect. Please find attached the entire registration as amended.

A copy of the registration 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 Donald McQuigg, at (800) 451-6027, press 0 and ask for Donald McQuigg or extension 4-4240, or dial (317) 234-4240.



A State that Works

Sincerely,



Chrystal Wagner, Section Chief
Permits Branch
Office of Air Quality

CW/dm

Attachment: Revised Registration
cc: File - Kosciusko County
Kosciusko County Health Department
Compliance and Enforcement Branch



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REGISTRATION OFFICE OF AIR QUALITY

NEWCO DT, Inc.
State Road 15 North and Poor Drive
Warsaw, Indiana 46581

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

Registration No. R085-12667-00055	
Original issued by/signed by: Paul Dubenetzky, Chief Permits Branch Office of Air Management	Issuance Date: November 28, 2000

Administrative Amendment No. 085-34808-00055	
Issued by:  Chrystal Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 20, 2014

SECTION A

SOURCE SUMMARY

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

A.1 General Information

The Registrant owns and operates a stationary coated and laminated window shade and projection screen manufacturing plant.

Source Address:	State Road 15 North and Poor Drive, Warsaw, IN 46581
General Source Phone Number:	(219) 269-1280
SIC Code:	2295
County Location:	Kosciusko County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Two (2) batch mixers;
- (b) One (1) natural gas-fired steam boiler, constructed in January 1975, rated at 0.65 MMBtu/hr;
- (c) Four (4) natural gas-fired drying ovens, each rated at 3.2 MMBtu/hr;
- (d) Ten (10) various capacity natural gas-fired space heaters with a total heat input rating of 1.42 MMBtu/hr;
- (e) Three (3) natural gas-fired space heaters, rated at 0.1725 MMBtu/hr, 0.1725 MMBtu/hr and 0.075 MMBtu/hr, respectively; and
- (f) One (1) natural gas-fired steam boiler, constructed in August 1999, rated at 1.666 MMBtu/hr.

SECTION B

GENERAL CONDITIONS

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

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

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

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

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

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

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

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

- (a) All terms and conditions of permits established prior to Registration No. R085-12667-00055 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.

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

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

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

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

Indianapolis, IN 46204-2251

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

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

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

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

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

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

- (a) If required by specific condition(s) in Section D of this registration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this registration or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Registrant shall implement the PMPs.

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

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

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

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

SECTION D.1

OPERATION CONDITIONS

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

- (a) Two (2) batch mixers;
- (b) One (1) natural gas-fired steam boiler, constructed in January 1975, rated at 0.65 MMBtu/hr; and
- (c) One (1) natural gas-fired steam boiler, constructed in August 1999, rated at 1.666 MMBtu/hr.

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

Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.1.1 Particulate Matter [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), the particulate matter (PM) from the two (2) batch mixers shall not exceed 0.381 pounds per hour when operating at a process weight rate of 0.029 tons per hour. The pound per hour limitation was calculated with the following equation:

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.1.2 Particulate Matter [326 IAC 6-2]

- (a) Pursuant 326 IAC 6-2-3(e) (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the one (1) 0.65 MMBtu/hr natural gas-fired boiler (constructed in January 1975) shall not exceed 0.6 lb/MMBtu heat input.
- (b) Pursuant to 326 IAC 6-2-4(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 1.666 MMBtu/hr natural gas-fired boiler (constructed in August 1999) shall not exceed 0.6 lb/MMBtu heat input.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for each facility and its control device. Section B - Preventive Maintenance Plan contains the Registrant's obligation with regard to the preventive maintenance plan required by this condition.

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

**REGISTRATION
ANNUAL NOTIFICATION**

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

Company Name:	NEWCO DT, Inc.
Address:	State Road 15 and Poor Drive
City:	Warsaw, IN 46581
Phone Number:	(219) 269-1280
Registration No.:	R085-12667-00055

I hereby certify that NEWCO DT, Inc. is :

still in operation.

I hereby certify that NEWCO DT, Inc. is :

no longer in operation.

in compliance with the requirements of Registration No. R085-12667-00055.

not in compliance with the requirements of Registration No. R085-12667-00055.

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

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

Noncompliance:

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

Technical Support Document (TSD) for an Administrative Amendment to a
Registration

Source Description and Location

Source Name:	NEWCO DT, Inc.
Source Location:	State Road 15 North and Poor Drive, Warsaw, IN 46581
County:	Kosciusko
SIC Code:	2295
Registration No.:	R085-34808-00055
Registration Issuance Date:	July 31, 2013
Administrative Amendment No.:	085-34808-00055
Permit Reviewer:	Donald McQuigg

On August 6, 2014, the Office of Air Quality (OAQ) received an application from NEWCO DT, Inc. related to a modification to an existing stationary coated and laminated window shade and projection screen manufacturing plant.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Registration No. R085-12667-00055, issued on November 28, 2000.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
 Kosciusko County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
 Kosciusko 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

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

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by NEWCO DT, Inc. on August 6, 2014, relating to the removal of the one (1) DOTP holding tank and a source name change.

The following is a list of the existing emission unit being removed:

- (a) One (1) DOTP holding tank with a capacity of 1,500 gallons.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

PTE of the Entire Source After Issuance of the Registration Administrative Amendment

The table below summarizes the potential to emit of the entire source after the issuance of this administrative amendment, reflecting all limits, of the emission units, using **bold** and ~~strikeouts~~ to show the changes:

Process/ Emission Unit	Potential To Emit of the Entire Source with the Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NOx	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Batch mixers	0.03	0.03	0.03	-	-	11.90 11.61	-	-	0.135	0.105 (vinyl chloride)
Natural gas combustion	0.14	0.55	0.55	0.04	7.28	0.40	6.12	8,789	0.137	0.131 (hexane)
Total PTE of Entire Source	0.17	0.58	0.58	0.04	7.28	12.34 12.01	6.12	8,789	0.272	0.131 (hexane)
Exemptions Levels	5	5	5	10	10	10	25	100,000	25	10
Registration Levels	25	25	25	25	25	25	100	100,000	25	10

Process/ Emission Unit	Potential To Emit of the Entire Source with the Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". **The 100,000 CO ₂ e threshold represents the Title V and PSD subject-to-regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.										

The table below summarizes the potential to emit of the entire source after issuance of this administrative amendment, reflecting all limits, of the emission units.

Process/ Emission Unit	Potential To Emit of the Entire Source with the Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Batch mixers	0.03	0.03	0.03	-	-	11.61	-	-	0.135	0.105 (vinyl chloride)
Natural gas combustion	0.14	0.55	0.55	0.04	7.28	0.40	6.12	8,789	0.137	0.131 (hexane)
Total PTE of Entire Source	0.17	0.58	0.58	0.04	7.28	12.01	6.12	8,789	0.272	0.131 (hexane)
Exemptions Levels	5	5	5	10	10	10	25	100,000	25	10
Registration Levels	25	25	25	25	25	25	100	100,000	25	10
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". **The 100,000 CO ₂ e threshold represents the Title V and PSD subject-to-regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.										

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of VOC are within the ranges listed in 326 IAC 2-5.5-1(b)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.5-1(b)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.5 (Registrations). A registration will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject-to-regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent (CO₂e) emissions per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the registration for the 0.65 MMBtu/hr natural gas-fired boiler or the 1.666 MMBtu/hr natural gas-fired boiler because they each have a maximum heat input rate of less than ten (10) MMBtu/hr.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the registration.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ are not included in the registration. This rule applies to area sources with new and existing boilers belonging to one of the following subcategories as defined in Section 63.11237:

- (1) Coal
- (2) Biomass
- (3) Oil
- (4) Seasonal boilers
- (5) Oil-fired boilers with heat input capacity of equal to or less than 5 million British thermal units (Btu) per hour
- (6) Boilers with an oxygen trim system that maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune-up.
- (7) Limited-use boilers.

The natural gas-fired boilers at this source are not subject to this area source NESHAP because they are not one of the subcategories listed in the rule.

- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the registration.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

326 IAC 2-5.5 (Registrations)

Registration applicability is discussed under the Permit Level Determination – Registration section above.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than twenty-five (25) tons per year. Therefore, 326 IAC 6-5 does not apply.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.

Natural gas-fired boilers

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

(a) Pursuant 326 IAC 6-2-3(e) (Particulate Matter Emission Limitations for Sources of Indirect Heating), indirect heating units which began operation after June 8, 1972 and before September 21, 1983 shall be limited to 0.6 lb/MMBtu. Therefore, the PM emissions from the one (1) 0.65 MMBtu/hr natural gas-fired boiler (constructed in January 1975) shall not exceed 0.6 lb/MMBtu heat input.

(b) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the allowable PM emissions from indirect heating units which began operation after September 12, 1983 shall be calculated using the following equation:
$$Pt = 1.09/Q^{0.26}$$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input

Q = total source max. indirect heater input = 1.666 MMBtu/hr

$$Pt = 1.09/1.666^{0.26} = 0.95 \text{ lbs PM/MMBtu}$$

Pursuant to 326 IAC 6-2-4(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating), indirect heating units which have 10 MMBtu/hr heat input or less and which began operation after September 21, 1983 shall in no case exceed 0.6 lb/MMBtu heat input. Therefore, PM emissions from the 1.666 MMBtu/hr natural gas-fired boiler (constructed in August 1999) shall not exceed 0.6 lb/MMBtu heat input.

Batch mixers

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) emissions from the two (2) batch mixers shall be limited by the following:

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

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

Based on the above equation, particulate matter emissions from the two (2) batch mixers shall be limited to 0.381 pounds per hour for a maximum process rate of 0.029 ton per hour.

Compliance calculation:

$$(0.03 \text{ tons PM/yr}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 0.007 \text{ lbs PM/hr}$$

Actual uncontrolled lbs PM/hr emission rate is less than the allowable lbs PM/hr emission rate; therefore, the two (2) batch mixers are capable of complying with the requirements of 326 IAC 6-3-2 without the use of a control device.

Proposed Changes

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

Change No. 1: The following revisions reflect the removal of the one (1) DOTP holding tank:

Re: Registered Construction and Operation Status, 085-12667-00055

Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following coated and laminated window shades and projection screen fabrics manufacturing plant, to be located at State Road 15 North, Poor Drive, Warsaw, Indiana, 46581 is classified as registered:

- (a) ~~One (1) DOTP holding tank with a capacity of 1,500 gallons;~~
- (~~b~~ **a**) Two (2) batch mixers;
- (~~e~~ **b**) One (1) natural gas-fired steam boiler rated at 0.65 MMBtu/hr;
- (~~d~~ **c**) Four (4) natural gas-fired drying ovens, each rated at 3.2 MMBtu/hr;
- (~~e~~ **d**) Ten (10) various capacity natural gas-fired space heaters with a total heat input rating of 1.42 MMBtu/hr;
- (~~f~~ **e**) Three (3) natural gas-fired space heaters, rated at 0.1725 MMBtu/hr, 0.1725 MMBtu/hr and 0.075 MMBtu/hr, respectively; and
- (~~g~~ **f**) One (1) natural gas-fired steam boiler, rated at 1.666 MMBtu/hr.

Change No. 2: The company name has been revised throughout the registration as follows:

~~Indiana Coated Fabrics, Inc.~~
NEWCO DT, Inc.

Additional Changes

Upon further review, IDEM, OAQ has made additional amendments to the registration as described below.

1. The registration has been updated from the letter style format to the permit style format, as is now standard IDEM procedure. In addition, IDEM has begun implementing a new procedure and will no longer list the name or title of the Authorized Individual (AI) in registrations.
2. Pursuant to 326 IAC 2-7-1(39), starting July 1, 2011, greenhouse gas (GHG) emissions are subject to regulation at a source with a potential to emit (PTE) 100,000 tons per year or more of CO₂ equivalent (CO₂e) emissions. Therefore, CO₂e emissions have been calculated for this source. Based on the calculations, the unlimited PTE of GHGs from the entire source is less than 100,000 tons of CO₂e per year (see Appendix A for the calculations). This did not require any changes to the registration.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on August 6, 2014.

The operation of this source shall be subject to the conditions of the attached proposed Registration Administrative Amendment No. 085-34808-00055. The staff recommends to the Commissioner that this administrative amendment be approved.

IDEM Contact

- (a) Questions regarding this proposed Registration can be directed to Donald McQuigg 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) 234-4240 or toll free at 1-800-451-6027 extension 4-4240.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

**TSD Appendix A: Emissions Calculations
Emissions Summary**

Company Name: NEWCO DT, Inc.
Address City IN Zip: State Road 15 North & Poor Drive, Warsaw, IN 46581
Registration No.: R085-12667-00055
Registration Issuance Date: November 28, 2000
Administrative Amendment No.: 085-34808-00055
Reviewer: Donald McQuigg
Date: August 6, 2014

Unlimited/Uncontrolled Potential to Emit (tons/year)*										
Process description	PM	PM ₁₀	PM _{2.5}	SO ₂	NOx	VOC	CO	GHG as CO ₂ e	Total HAPs	Worst Single HAP
mixers	0.03	0.03	0.03	-	-	11.61	-	-	0.135	0.105 vinyl chloride
natural gas combustion	0.14	0.55	0.55	0.04	7.28	0.40	6.12	8,789	0.137	0.131 hexane
Total Potential to Emit	0.17	0.58	0.58	0.04	7.28	12.01	6.12	8,789	0.27	0.131 hexane

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

Company Name: NEWCO DT, Inc.
Address City IN Zip: State Road 15 North & Poor Drive, Warsaw, IN 46581
Registration No.: R085-12667-00055
Registration Issuance Date: November 28, 2000
Administrative Amendment No.: 085-34808-00055
Reviewer: Donald McQuigg
Date: August 6, 2014

	Units	MMBtu/hr
Ten (10) natural gas-fired space heaters		1.42
Four (4) natural gas-fired drying ovens		12.8
Natural gas-fired boiler		0.65
Natural gas-fired boiler		1.666
Two (2) natural gas-fired space heaters		0.345
One (1) natural gas-fired space heater		0.075
Total		16.956

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
16.956	1020	145.6

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.14	0.55	0.55	0.04	7.28	0.40	6.12

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology:

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

HAPS Calculations

Emission Factor in lb/MMcf	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total Organics
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.529E-04	8.737E-05	5.461E-03	1.311E-01	2.476E-04	1.370E-01

Emission Factor in lb/MMcf	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total Metals
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	3.641E-05	8.009E-05	1.019E-04	2.767E-05	1.529E-04	3.990E-04
					Total HAPs	1.374E-01
					Worst HAP	1.311E-01

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Greenhouse Gas Calculations

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	8,737	0.2	0.2
Summed Potential Emissions in tons/yr	8,738		
CO2e Total in tons/yr	8,789		

Methodology:

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

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

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

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

Appendix A: Emissions Calculations
VOC, HAPs, and PM Emissions from the Batch Mixers

Company Name: NEWCO DT, Inc.
Address City IN Zip: State Road 15 North & Poor Drive, Warsaw, IN 46581
Registration No.: R085-12667-00055
Registration Issuance Date: November 28, 2000
Administrative Amendment No.: 085-34808-00055
Reviewer: Donald McQuigg
Date: August 6, 2014

1. VOC emissions from the two (2) batch mixers

Material	Actual Usage (lb/yr) @ 2500 hr/yr	Weight Percent VOC	Actual VOC (ton/yr)	VOC PTE (ton/yr)
Antimony compound	24,000	0.09%	0.011	0.0378
PVC film	800,000	0.80%	3.200	11.2128
Polyvinyl chloride	120,000	0.05%	0.030	0.1051
Latex	76,300	0.03%	0.011	0.0401
407 acrylic	29,925	0.40%	0.060	0.2097
DOTP	85,040	0.20%	0.085	0.2980
Total			3.40	11.90
			3.31	11.61

Methodology

Actual VOC Emissions (ton/yr) = Actual Usage (lb/yr) * Wt% VOC * 1 ton/2000 lbs

Potential VOC Emissions (ton/yr) = Actual Emissions (ton/yr) * 8760 hrs/2500 hrs

2. HAP emissions from the two (2) batch mixers

Material	Actual Usage (lb/yr) @ 2500 hr/yr	Weight Percent HAP	Actual HAP (ton/yr)	HAP PTE (ton/yr)	HAP
Polyvinyl chloride	120,000	0.05%	0.030	0.105	vinyl chloride
407 acrylic	29,925	0.047%	0.007	0.025	ethyl acrylate
Antimony compound				0.005	antimony
Total =				0.135	

Methodology

Actual HAP Emissions (ton/yr) = Actual Usage (lb/yr) * Wt% HAP * 1 ton/2000 lbs

Potential HAP Emissions (ton/yr) = Actual Emissions (ton/yr) * 8760 hrs/2500 hrs

3. Uncontrolled PM/PM10/PM2.5 emissions from material dumping into the two (2) batch mixers

Material	Actual Usage (lb/yr) @ 2500 hr/yr	Emission Factor (lb/ton)	Actual PM (ton/yr)	PM PTE (ton/yr)	PM PTE (lb/hr)
Antimony compound	24,000	0.24	0.001	0.005	0.0012
Polyvinyl chloride	120,000	0.24	0.007	0.025	0.0058
Total	144,000		0.009	0.030	0.007

Methodology

Emission factor for batch drop, AP 42, 13.2.4.3 Emission Factor equation

Uncontrolled PM PTE (ton/yr) = Actual Usage (ton/yr) * Emission Factor * 1 ton/2000 lbs

4. 326 IAC 6-3-2 Allowable PM Emissions

According to 326 IAC 6-3-2, the allowable particulate matter (PM) emissions rate in pounds per hour (lbs/hour) is determined using the following equation:

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

Where:

E = allowable particulate matter (PM) emissions rate in pounds per hour (lbs/hour)

P = process weight rate in tons per hour

P = 0.029 ton/hr

E = 0.381 lb/hr

The uncontrolled potential to emit PM is less than the allowable emissions. Therefore, the source is able to comply with 326 IAC 6-3-2.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Timothy R. Foster
NEWCO DT, Inc.
PO Box 1017
Warsaw, IN 46581

DATE: August 20, 2014

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

SUBJECT: Final Decision
Registration Administrative Amendment
085-34808-00055

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:
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

Mail Code 61-53

IDEM Staff	VHAUN 8/20/2014 NEWCO DT Incorporated 085-34808-00055 FINAL		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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2		Warsaw City Council and Mayors Office 102 S Buffalo Street Warsaw IN 46580 (Local Official)										
3		Kosciusko County Board of Commissioners 100 W. Center St, Room 220 Warsaw IN 46580 (Local Official)										
4		Etna Green Town Council P.O. Box 183, 132 West Broadway Etna Green IN 46524 (Local Official)										
5		Kosciusko County Health Department 100 W. Center Street, 3rd Floor Warsaw IN 46580-2877 (Health Department)										
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