



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and
Minor Source Operating Permit (MSOP)

for Gator Cases Inc. in Whitley County

MSOP No.: M183-35843-00049

The Indiana Department of Environmental Management (IDEM) has received an application from Gator Cases Inc., located at 2499 South 600 East, Columbia City, IN 46725, for a new source construction and MSOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Gator Cases Inc. to construct and operate a new plastic molding plant.

IDEM is aware that all the equipment at the source has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft MSOP contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

A copy of the permit application and IDEM's preliminary findings are available at:

Whitley County Library
1160 East Hwy 205
Columbia City, IN 46725

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M183-35843-00049 in all correspondence.



A State that Works

Comments should be sent to:

Mehul Sura
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-6868
Or dial directly: (317) 233-6868
Fax: (317) 232-6749 attn: Mehul Sura
E-mail: msura@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

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>.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Mehul Sura or my staff at the above address.


Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality



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Michael R. Pence
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Commissioner

DRAFT

New Source Construction and Minor Source Operating Permit OFFICE OF AIR QUALITY

**Gator Cases Inc.
2499 South 600 East
Columbia City, Indiana 46725**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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

Operation Permit No.: M183-35843-00049	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary plastic molding plant.

Source Address:	2499 South 600 East, Columbia City, Indiana 46725
General Source Phone Number:	(260) 213-4616
SIC Code:	3089 (Plastics Products, Not Elsewhere Classified)
County Location:	Whitley
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program
	Minor Source, under PSD and Emission Offset Rules
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Two (2) plastic molding operations, identified as PM1 and PM2, approved in 2015 for construction, each with a maximum capacity of 77.2 pounds per hour, without control and exhausting to stacks SV1 and SV2, respectively.
- (b) One (1) plastic grinding operation, identified as PG, approved in 2015 for construction, with a maximum capacity of 10 pounds per hour, without control and exhausting inside.
- (c) One (1) wood working operation for custom wood cases, identified as WW, approved in 2015 for construction, with a maximum capacity of 35 pounds per hour, with baghouse (BH1) as integral control and exhausting inside.
- (d) One (1) ink stamping operation, identified as IS, approved in 2015 for construction, with a maximum capacity of 1 gallon of ink per hour, without control and exhausting inside.
- (e) Three (3) Welding stations, identified as W1, W2 and W3, approved in 2015 for construction, each with a maximum capacity of 1 pound of electrodes per hour, without control and exhausting inside.
- (f) One (1) flame cutting station, identified as F, approved in 2015 for construction, with a maximum cutting rate of 15 inches of metal per minute, without control and exhausting inside.
- (g) One (1) abrasive blasting operation, identified as AB, approved in 2015 for construction, with a maximum capacity of 560 pounds of abrasive (steel shots) per hour, without control and exhausting to stack SV3.
- (h) One (1) metal coating operation, identified as MC, approved in 2015 for construction, using brush application method, with a maximum capacity of 2 units per hour, without control and exhausting to outside.

- (i) Natural gas-fired space heaters, collectively identified as NG, approved in 2015 for construction, without control, exhausting inside and consisting of the following:

Unit	# of Units	Maximum Heat Input Capacity (MMBtu/hr) each
MODINE	2	0.1
ROBERTS GORDON	2	0.2
ROBERTS GORDON	6	0.1
DAYTON	2	0.2
DAYTON	2	0.2
DAYTON	2	0.1
DAYTON	2	0.1
BRYANY	8	0.2
CARRIER AIR	2	0.2
MAGIC CHEF	1	0.2
RENZOR	1	0.2
RENZOR	3	0.2
RENZOR	1	0.2
YORK	1	0.1
ROTOLINE 3.0	1	1.9
ROTOLINE2.5	1	1.2
Total	37	5.31

- (j) Hand held machining operations.
- (k) Paved roads.
- (l) Cleaners and solvent application for maintenance purpose only with total usage less than 145 gallons per year.
- (m) Brazing, soldering and welding operations associated with maintenance activities.
- (n) Open tumblers for deburring operations in maintenance shop.
- (o) Hot melt adhesive with no VOC emissions.
- (p) Manual loading and unloading operations.
- (q) Machining with aqueous cutting coolant.

SECTION B GENERAL CONDITIONS

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

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

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as described in the application or the permit. The emission units covered in this permit may continue operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as described.
- (b) If actual construction of the emission units differs from the construction described in the application, the source may not continue operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M183-35843-00049, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.6 Enforceability

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

B.7 Severability

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

B.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

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

B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

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

The Permittee shall implement the PMPs.

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

B.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M183-35843-00049 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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

B.14 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

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

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

B.16 Source Modification Requirement

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

B.17 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

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

B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

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

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

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

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

B.19 Annual Fee Payment [326 IAC 2-1.1-7]

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

B.20 Credible Evidence [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale

such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

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

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

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

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ

that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

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

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

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

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

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

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

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

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

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) plastic molding operations, identified as PM1 and PM2, approved in 2015 for construction, each with a maximum capacity of 77.2 pounds per hour, without control and exhausting to stacks SV1 and SV2, respectively.
- (b) One (1) plastic grinding operation, identified as PG, approved in 2015 for construction, with a maximum capacity of 10 pounds per hour, without control and exhausting inside.
- (c) One (1) wood working operation for custom wood cases, identified as WW, approved in 2015 for construction, with a maximum capacity of 35 pounds per hour, with baghouse (BH1) as integral control and exhausting inside.
- (d) One (1) ink stamping operation, identified as IS, approved in 2015 for construction, with a maximum capacity of 1 gallon of ink per hour, without control and exhausting inside.
- (e) Three (3) Welding stations, identified as W1, W2 and W3, approved in 2015 for construction, each with a maximum capacity of 1 pound of electrodes per hour, without control and exhausting inside.
- (f) One (1) flame cutting station, identified as F, approved in 2015 for construction, with a maximum cutting rate of 15 inches of metal per minute, without control and exhausting inside.
- (g) One (1) abrasive blasting operation, identified as AB, approved in 2015 for construction, with a maximum capacity of 560 pounds of abrasive (steel shots) per hour, without control and exhausting to stack SV3.
- (h) One (1) metal coating operation, identified as MC, approved in 2015 for construction, using brush application method, with a maximum capacity of 2 units per hour, without control and exhausting to outside.
- (i) Natural gas-fired space heaters, collectively identified as NG, approved in 2015 for construction, without control, exhausting inside and consisting of the following:

Unit	# of Units	Maximum Heat Input Capacity (MMBtu/hr) each
MODINE	2	0.1
ROBERTS GORDON	2	0.2
ROBERTS GORDON	6	0.1
DAYTON	2	0.2
DAYTON	2	0.2
DAYTON	2	0.1
DAYTON	2	0.1
BRYANY	8	0.2
CARRIER AIR	2	0.2
MAGIC CHEF	1	0.2
RENZOR	1	0.2
RENZOR	3	0.2
RENZOR	1	0.2
YORK	1	0.1
ROTOline 3.0	1	1.9
ROTOline 2.5	1	1.2
Total	37	5.31

- (j) Hand held machining operations.

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

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

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

- (a) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from each of the following process with a maximum process weight rate less than 100 pounds per hour, shall not exceed 0.551 pounds per hour.

(i) plastic grinding operation (PG)

(ii) wood working operation (WW)

- (b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the abrasive blasting operation (AB) shall not exceed 1.74 pounds per hour when operating at a process weight rate of 0.28 tons per hour (560 pounds 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 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.3 Particulate Control

- (a) In order to comply with the particulate limit specified in Condition D.1.1 for the wood working operation (WW), the baghouse (BH1) equipped on the wood working operation (WW) for particulate control shall be in operation and control emissions from the wood working operation (WW) at all times that the wood working operation (WW) is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.1.4 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the wood working operation (WW). All defective bags shall be replaced.

D.1.5 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.1.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.4, the Permittee shall maintain records of the results of the inspections required under Condition D.1.4.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Gator Cases Inc.
Address:	2499 South 600 East
City:	Columbia City, Indiana 46725
Phone #:	(260) 213-4616
MSOP #:	M183-35843-00049

I hereby certify that Gator Cases Inc. is:

☐ still in operation.

☐ no longer in operation.

I hereby certify that Gator Cases Inc. is:

☐ in compliance with the requirements of
MSOP M183-35843-00049.

☐ not in compliance with the requirements of
MSOP M183-35843-00049.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

COMPANY: _____ PHONE NO. () _____

LOCATION: (CITY AND COUNTY) _____

PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

Gator Cases Inc.
2499 South 600 East
Columbia City, Indiana 46725

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make
these representations on behalf of _____.
(Company Name)
4. I hereby certify that Gator Cases Inc. 2499 South 600 East, Columbia City, Indiana 46725, has constructed and will operate a plastic molding plant on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on May 20, 2015 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M183-35843-00049, Plant ID No. 183-00049 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana
on this _____ day of _____, 20 _____. My Commission expires: _____.

Signature _____
Name _____ (typed or printed)

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

**Technical Support Document (TSD) for a
New Source Construction and Minor Source Operating Permit (MSOP)**

Source Description and Location
--

Source Name:	Gator Cases Inc.
Source Location:	2499 South 600 East, Columbia City, IN 46725
County:	Whitley
SIC Code:	3089 (Plastics Products, Not Elsewhere Classified)
Operation Permit No.:	M183-35843-00049
Permit Reviewer:	Mehul Sura

On May 20, 2015, the Office of Air Quality (OAQ) received an application from Gator Cases Inc. related to the construction and operation of a new plastic molding plant.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Whitley 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. Whitley 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}**
Whitley County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (c) Other Criteria Pollutants
Whitley County has been classified as attainment or unclassifiable in Indiana for all other 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.

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Gator Cases Inc. on May 20, 2015, relating to the construction and operation of the following new emission units and pollution control devices:

- (a) Two (2) plastic molding operations, identified as PM1 and PM2, approved in 2015 for construction, each with a maximum capacity of 77.2 pounds per hour, without control and exhausting to stacks SV1 and SV2, respectively.
- (b) One (1) plastic grinding operation, identified as PG, approved in 2015 for construction, with a maximum capacity of 10 pounds per hour, without control and exhausting inside.
- (c) One (1) wood working operation for custom wood cases, identified as WW, approved in 2015 for construction, with a maximum capacity of 35 pounds per hour, with baghouse (BH1) as integral control and exhausting inside.
- (d) One (1) ink stamping operation, identified as IS, approved in 2015 for construction, with a maximum capacity of 1 gallon of ink per hour, without control and exhausting inside.
- (e) Three (3) Welding stations, identified as W1, W2 and W3, approved in 2015 for construction, each with a maximum capacity of 1 pound of electrodes per hour, without control and exhausting inside.
- (f) One (1) flame cutting station, identified as F, approved in 2015 for construction, with a maximum cutting rate of 15 inches of metal per minute, without control and exhausting inside.
- (g) One (1) abrasive blasting operation, identified as AB, approved in 2015 for construction, with a maximum capacity of 560 pounds of abrasive (steel shots) per hour, without control and exhausting to stack SV3.
- (h) One (1) metal coating operation, identified as MC, approved in 2015 for construction, using brush application method, with a maximum capacity of 2 units per hour, without control and exhausting to outside.
- (i) Natural gas-fired space heaters, collectively identified as NG, approved in 2015 for construction, without control, exhausting inside and consisting of the following:

Unit	# of Units	Maximum Heat Input Capacity (MMBtu/hr) each
MODINE	2	0.1
ROBERTS GORDON	2	0.2

Unit	# of Units	Maximum Heat Input Capacity (MMBtu/hr) each
ROBERTS GORDON	6	0.1
DAYTON	2	0.2
DAYTON	2	0.2
DAYTON	2	0.1
DAYTON	2	0.1
BRYANY	8	0.2
CARRIER AIR	2	0.2
MAGIC CHEF	1	0.2
RENZOR	1	0.2
RENZOR	3	0.2
RENZOR	1	0.2
YORK	1	0.1
ROTOLINE 3.0	1	1.9
ROTOLINE2.5	1	1.2
Total	37	5.31

- (j) Hand held machining operations.
- (k) Paved roads.
- (l) Cleaners and solvent application for maintenance purpose only with total usage less than 145 gallons per year.
- (m) Brazing, soldering and welding operations associated with maintenance activities.
- (n) Open tumblers for deburring operations in maintenance shop.
- (o) Hot melt adhesive with no VOC emissions.
- (p) Manual loading and unloading operations.
- (q) Machining with aqueous cutting coolant.

Air Pollution Control Justification as an Integral Part of the Process

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, potential emissions for particulate matter for the wood working operation (EU-07) were calculated after consideration of the controls for determining operating permit level purposes.

Enforcement Issues

IDEM is aware that the equipment listed under 'Background and Description of New Source Construction' section of this TSD has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

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

Pollutant	PM	PM10 ⁽¹⁾	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Potential To Emit (tons/year)	26.80	25.34	25.28	0.02	3.75	32.49	3.15	0.57	0.53

- (1) 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) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".
- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM, PM10, PM2.5 and VOC, each, is less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) 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.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) Subpart XXXXXX — National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

This type source is not described in Table 1 of this NESHAP. Therefore, this source is not subject to the requirements of this NESHAP.

- (c) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit due to this for this source.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 1-5-2 (Emergency Reduction Plans)
The source is not subject to 326 IAC 1-5-2, because the potential to emit of any pollutant is less than one hundred (100) tons per year.
- (b) 326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3, because the source is required have a permit under 326 IAC-2-6.1 (Minor Source Operating Permit (MSOP)).
- (c) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (d) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))

This new existing source is not a major stationary source, under PSD (326 IAC 2-2), because:
(1) the potential to emit all PSD regulated pollutants are less than 250 tons per year, and
(2) this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (e) 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.
- (f) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (g) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

- (h) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
The source is subject to the requirements of 326 IAC 6-4, because the paved roads have the potential to emit fugitive particulate emissions. 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.
- (i) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This rule does not apply to the source because the source-wide fugitive particulate emissions are less than 25 tons per year.
- (j) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (k) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.
- (l) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
 - (i) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from each of the following process with a maximum process weight rate less than 100 pounds per hour, shall not exceed 0.551 pounds per hour.
 - (a) plastic grinding operation (PG)
 - (b) wood working operation (WW)

The baghouse (BH1) equipped on the wood working operation (WW) for particulate control shall be in operation and control emissions from the wood working operation (WW) at all times that the wood working operation (WW) is in operation.
 - (ii) Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than 0.551 pound per hour are exempt from this rule. The following processes have potential PM emissions of less than 0.551 pound per hour; therefore, they are not subject to the requirements of this rule.
 - (a) plastic molding operations (PM1 and PM2)
 - (b) welding stations (W1, W2 and W3)
 - (c) flame cutting station (F)
 - (d) natural gas-fired space heaters (NG)
 - (iii) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the abrasive blasting operation (AB) shall not exceed 1.74 pounds per hour when operating at a process weight rate of 0.28 tons per hour (560 pounds 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:

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

- (iv) The ink stamping operation (IS) and metal coating operation (MC) are using brush application method and therefore, the PM emissions from these processes are negligible. As a result, these operations are not subject to the requirements of this rule.
- (v) Pursuant to 326 IAC 6-3-1(b)(13), the trivial activities (as defined under 326 IAC 2-7-1) are exempt from the requirements of this rule. The following manufacturing processes are trivial activities (as defined under 326 IAC 2-7-1), therefore, these processes are exempt from the requirements of this rule.
 - (a) hand held machining operations
 - (b) manual loading and unloading operations
- (m) 326 IAC 8 (VOC rules)
 - (i) plastic molding operations (PM1 and PM2) and natural gas-fired space heaters (NG)

These facilities has potential VOC emissions less than 15 pounds per day; therefore, these facilities are not subject to the requirements of 326 IAC 8.
 - (ii) ink stamping operation (IS)

The ink stamping operation (IS) is not subject to the requirements of 326 IAC 8-1-6 because it has potential VOC emissions less than 25 tons per year. There are no other limits or standards are specified 326 IAC 8 (VOC Rules) for this type of operation.
 - (i) metal coating operation (MC)

The coating operation at the metal coating operation (MC) is performed on the metal pieces which are used to support plastic cases, speaker boxes and other miscellaneous cases. The coating operation at the metal coating operation (MC) is not performed for any of the following:

 - (A) Large and small farm machinery.
 - (B) Small household appliances.
 - (C) Office equipment.
 - (D) Commercial and industrial machinery and equipment.
 - (E) Any other industrial category that coats metal parts or products under the Standard Industrial Classification Code of major groups #33, #34, #35, #36, #37, #38, and #39.

Therefore, the metal coating operation (MC) is not subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) rule.

The metal coating operation (MC) is also not subject to the requirements of 326 IAC 8-1-6 because it has potential VOC emissions less than 25 tons per year. There are no other limits or standards are specified 326 IAC 8 (VOC Rules) for this type of operation.
 - (iv) cleaners and solvent application

The cleaners and solvent application process has potential VOC emissions less than 15 pounds per day. Therefore, this process is not subject to the requirements of 326 IAC 8.

Compliance Determination, Monitoring and Testing Requirements

The compliance determination and monitoring requirements applicable to this source are as follows:

Control	Emission unit	Parameter	Frequency
baghouse (BH1)	wood working operation (WW)	baghouse inspection	quarterly

This monitoring condition is necessary because the baghouse (BH1) must operate properly to ensure compliance with 326 IAC 6-3.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on May 20, 2015.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and MSOP No. M183-35843-00049. The staff recommends to the Commissioner that this New Source Construction and MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Mehul Sura 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) 233-6868 or toll free at 1-800-451-6027 extension 3-6868.
- (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>.

Emissions Summary

	Uncontrolled Potential to Emit (PTE) (tons/year)										
Emission Units	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP	
plastic molding operations (PM1 and PM2)	–	–	–	–	–	0.34	–	–	0.03	0.03	Acetaldehyde
plastic grinding operation (PG)	5.00	5.00	5.00	–	–	–	–	–	–	–	–
wood working operation (WW)	1.15 *	1.15 *	1.15 *	–	–	–	–	–	–	–	–
ink stamping operation (IS)	–	–	–	–	–	21.46	–	–	0.42	0.42	Naphthalene
welding stations (W1, W2 and W3) and flame cutting station (F)	0.39	0.39	0.39	–	–	–	–	–	0.04	0.04	Manganese
abrasive blasting operation (AB)	9.81	8.44	8.44	–	–	-	–	–	–	–	–
metal coating operation (MC)	-	-	-	–	–	9.94	–	–	–	–	–
natural gas-fired space heaters (NG)	0.07	0.28	0.28	0.02	3.75	0.21	3.15	0.09	0.07	0.07	Hexane
hand held machining operations	5.00	5.00	5.00	-	-	-	-	-	-	-	-
paved Roads	0.38	0.08	0.02	–	–	–	–	–	–	–	–
cleaners and solvent application	-	-	-	-	-	0.54	-	-	-	-	-
manual loading and unloading operations	5.00	5.00	5.00	-	-	-	-	-	-	-	-
Total PTE	26.80	25.34	25.28	0.02	3.75	32.49	3.15	0.09	0.57	0.57	Hexane

* The emissions are after integral control (baghouse (BH1)).

natural gas-fired space heaters (NG)

Unit	# of Units	Maximum Heat Input Capacity (MMBtu/hr)	High Heat Value (MMBtu/MMscf)	Potential Throughput (MMcf/yr)
MODINE	2	0.1	1020	1.72
ROBERTS GORDON	2	0.2	1020	2.58
ROBERTS GORDON	6	0.1	1020	6.44
DAYTON	2	0.2	1020	3.44
DAYTON	2	0.2	1020	2.75
DAYTON	2	0.1	1020	2.06
DAYTON	2	0.1	1020	1.03
BRYANY	8	0.2	1020	13.74
CARRIER AIR	2	0.2	1020	3.44
MAGIC CHEF	1	0.2	1020	1.29
RENZOR	1	0.2	1020	2.14
RENZOR	3	0.2	1020	5.15
RENZOR	1	0.2	1020	1.43
YORK	1	0.1	1020	1.09
ROTOLINE 3.0	1	1.9	1020	16.32
ROTOLINE2.5	1	1.2	1020	10.31
Totals	37.00	5.31		74.9

	Pollutant						
	PM*	PM ₁₀ *	direct PM _{2.5} *	SO ₂	NO _x	VOC	CO
Emission Factor (lb/MMCF)	1.9	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission (tons/yr)	0.1	0.3	0.28	0.0	3.7	0.2	3.1

*PM emission factor is filterable PM only. PM₁₀ emission factor is filterable and condensable PM₁₀ combined. PM_{2.5} emission factor is filterable and condensable PM_{2.5} combined.

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission (tons/yr)	7.865E-05	4.494E-05	2.809E-03	6.742E-02	1.273E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission (tons/yr)	1.873E-05	4.120E-05	5.243E-05	1.423E-05	7.865E-05
Total HAPs:					7.068E-02

	Greenhouse Gas		
	CO ₂	CH ₄	N ₂ O
Emission Factor (lb/MMSCF)	120,000	2.3	2.2
Potential Emission (tons/yr)	4,494	0.1	0.1
Summed Potential Emissions (tons/yr)	4,495		
CO ₂ e Total (tons/yr)	4,522		

Notes:

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

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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

Methodology:

Total Heat Input Capacity (MMBtu/hr) = \sum (Heat Input Capacity Each (MMBtu/hr/unit) * Number of Units)

Potential Throughput (MMCF/yr) = Heat Input Capacity Each (MMBtu/hr) * Number of Units * 8,760 hrs/yr * High Heat Value (1 MMCF/1,020 MMBtu)

Potential Emission (tons/yr) = Total Max Throughput (MMCF/yr) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

CO₂e (tons/yr) = CO₂ Potential Emission ton/yr x CO₂ GWP (1) + CH₄ Potential Emission ton/yr x CH₄ GWP (21) + N₂O Potential Emission ton/yr x N₂O GWP (310).

plastic grinding operation (PG)

material throughput rate (lbs/hr)	emission factors (lb/ton)			uncontrolled emission (tons/year)		
	PM	PM10	PM2.5	PM	PM10	PM2.5
10	17	1.7	1.7	0.37	0.037	0.037

Methodology

emission factors are from SCC# 3-04-003-60.

uncontrolled emission (tons/year) = [material throughput rate (lbs/hr) / 2000 (lbs/ton)] x emission factors (lb/ton) x 8760 (hrs/yr) / 2000 (lbs/ton)

metal coating operation (MC)

Material	Density (lb./gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non- Volatiles (solids)	Gal of Mat. (gal/unit)	Max Unit/hr	lbs VOC/gal of coating less water	Lbs VOC/gal of coating	Potential VOC lbs/hr	Potential VOC lbs/day	Potential VOC tpy	lb VOC/gal solids
Pitt-Tech Gloss LTX Black	8.6	66.00%	0.00%	66.00%	0.00%	32.00%	0.20000	2	5.68	5.68	2.27	54.49	9.94	17.74

Methodology

Brush application method is used for coating. Therefore, the PM emissions are negligible.

Pounds of VOC/gal of coating less water = Density (lb/gal) x weight % organics) / (1-volume % water)

Pounds of VOC/gal coating = (Density (lb/gal)x weight % organics

Potential VOC lbs/hr = Lbs VOC/gal coating x Gal/unit x units/hr

Potential VOC lbs/day = Lbs of VOC/gal x gal/unit x units/hr x 24 hrs/day

Potential VOC tpy = lbs of VOC/galx gal/unit x units/hr x 8760 hr/yr x (1 ton/2000lb)

Pounds VOC/gal of solids = (density x weight & organics)/(Volume % solids)

ink stamping operation (IS)

Material	Density (lb/gallon)	VOC (lbs/gal)	HAP (Naphthalene) content (wt.%)	Throughput (gal/hr)	Potential VOC Emissions (tons/yr)	Potential HAPs Emissions (tons/yr)
Black Ink	8.3	4.9	-	1	21.46	-
Black 8900 Series	9.58	0.92	1	1	0.42	0.42

worst case

21.46 0.42

Methodology

Potential VOC Emissions (tons/yr) = Density (lb/gallon) x VOC (lbs/gal) x [8760 (hrs/yr) / 2000 (lbs/ton)]

Potential HAPs Emissions (tons/yr) = Density (lb/gallon) x [HAP (Naphthalene) content (wt.%) / 100] x 8760 (hrs/yr) / 2000 (lbs/ton)

wood working operation (WW)

Sawdust Generation (lbs/hr)	PTE of PM/PM10/PM2.5 before integral controls (tons/yr)	Control Efficiency	PTE of PM/PM10/PM2.5 after integral controls (lbs/hr)	PTE of PM/PM10/PM2.5 after integral controls (tons/yr)
5	23.05	95%	0.26	1.15

Methodology

PTE of PM/PM10/PM2.5 Before Integral Controls (tons/yr) = Sawdust Generation (lbs/hr) x [1/(Control Efficiency (%)) x (8760 hours x 1 ton/2000 lbs

PTE of PM/PM10/PM2.5 After Integral Controls (lbs/hr) = [(Sawdust Generation lbs/hr) x (1 - Control Efficiency %)] / Control Efficiency %

PTE of PM/PM10/PM2.5 After Integral Controls (tons/yr) = (PTE of PM/PM10/PM2.5 After Integral Controls (lbs/hr)) x [8760 (hrs/yr) / 2000 (lbs/ton)]

plastic molding operations (PM1 and PM2)

Unit	Capacity (lbs/hr)	Emission Factor		Potential Emissions (tons/yr)	
		VOC (lbs/ton)	HAPs (lbs/ton)	VOC	HAP's
Roto 2.5	77.200	1.0	0.100	0.169	0.017
Roto 3.0	77.200	1.0	0.100	0.169	0.017
		Totals		0.338	0.034

Methodology

Potential Emissions (tons/yr) = Emission Factor (lbs/ton) x (Capacity (lbs/hr) / 2000 (lbs/ton)) x 8760 (hr/yr) / 2000 (lbs/ton)

Emission factors for Polyethylene processing were developed by Wisconsin Department of Natural Resources, based on stack testing of polyethylene manufacturing sources as issued in New Source Construction and FESOP No. 179-24865-00024, issued on January 9, 2008.

hand held machining operations

PM (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)
less than 5	less than 5	less than 5

Methodology

Conservatively it is assumed that particulate emissions from these Hand-held equipment activities does not exceed exemption level specified in 326 IAC 2-1.1-3(e)(1)(Exemptions level).

manual loading and unloading operations

PM (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)
less than 5	less than 5	less than 5

Methodology

Conservatively it is assumed that particulate emissions from these Hand-held equipment activities does not exceed exemption level specified in 326 IAC 2-1.1-3(e)(1)(Exemptions level).

cleaners and solvent application

Solvent Density (lbs/gallon)	Solvent Usage (gallons/year)	VOC emissions (lbs/day)	Potential VOC Emissions (tons/yr)
7.4	145	2.94	0.54

Methodology

Potential VOC Emissions (tons/yr) = Solvent Density (lbs/gallon) x Solvent Usage (gallons/year) x 1/2000 (ton/lb)

abrasive blasting operation (AB)

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor (EF)	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487
Other	156

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate (FR1) of sand through a blasting nozzle as a function of nozzle pressure and internal diameter (ID1)

Nozzle Type (diameter)	Internal diameter, in	Nozzle Pressure (psig)							
		30	40	50	60	70	80	90	100
No. 2 (1/8 inch)	0.125	28	35	42	49	55	63	70	77
No. 3 (3/16 inch)	0.1875	65	80	94	107	122	135	149	165
No. 4 (1/4 inch)	0.25	109	138	168	195	221	255	280	309
No. 5 (5/16 inch)	0.3125	205	247	292	354	377	420	462	507
No. 6 (3/8 inch)	0.375	285	355	417	477	540	600	657	720
No. 7 (7/16 inch)	0.4375	385	472	560	645	755	820	905	940
No. 8 (1/2 inch)	0.5	503	615	725	835	945	1050	1160	1265
No. 10 (5/8 inch)	0.625	820	990	1170	1336	1510	1680	1850	2030
No. 12 (3/4 inch)	0.75	1140	1420	1670	1915	2160	2400	2630	2880
No. 16 (1 inch)	1	2030	2460	2900	3340	3780	4200	4640	5060

CALCULATIONS

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) of abrasive at nozzle pressure and internal nozzle diameter (ID)

$$D1 = \text{Density of Abrasive from Table 2} = \frac{487}{\text{lb/ft}^3}$$

$$ID1 = \text{Internal diameter of nozzle for sand blasting from Table 3} = \frac{0.44}{\text{inch}}$$

$$FR1 = \text{Sand flow rate at nozzle pressure and internal diameter (ID1) from Table 3} = \frac{560}{\text{lb/hr}}$$

$$D = \text{Density of actual abrasive} = \frac{487}{\text{lb/ft}^3}$$

$$ID = \text{internal diameter of actual nozzle} = \frac{0.44}{\text{inch}}$$

$$FR = \text{Flow rate of actual abrasive (lb/hr)} = \frac{560.0}{\text{lb/hr (per nozzle)}}$$

Potential to Emit Before Control

$$FR = \text{Flow rate of actual abrasive (lb/hr)} = \frac{560.0}{\text{lb/hr (per nozzle)}}$$

$$w = \text{fraction of time of wet blasting} = \frac{0}{\%}$$

$$N = \text{number of nozzles} = \frac{1}{}$$

$$EF = \text{PM emission factor for actual abrasive from Table 1} = \frac{0.004}{\text{lb PM/ lb abrasive}}$$

$$\text{PM10 emission factor ratio for actual abrasive from Table 1} = \frac{0.86}{\text{lb PM10 / lb PM}}$$

	PM	PM10	
Potential to Emit (before control) =	2.240	1.926	lb/hr
=	53.76	46.23	lb/day
=	9.81	8.44	ton/yr

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

Flow rate of actual abrasive (FR) (lb/hr) = $FR1 \times (ID/ID1)^2 \times (D/D1)$

Potential to Emit (before control) = $EF \times FR \times (1 - w/200) \times N$ (where w should be entered in as a whole number (if w is 50%, enter 50))

Potential to Emit (after control) = $[\text{Potential to Emit (before control)}] \times [1 - \text{control efficiency}]$

Potential to Emit (tons/year) = $[\text{Potential to Emit (lbs/hour)}] \times [8760 \text{ hours/year}] \times [\text{ton}/2000 \text{ lbs}]$

paved Roads

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	40.0	1.0	40.0	15.0	600.0	100	0.019	0.8	276.5
Vehicle (leaving plant) (one-way trip)	40.0	1.0	40.0	15.0	600.0	100	0.019	0.8	276.5
Totals			80.0		1200.0			1.5	553.0

Average Vehicle Weight Per Trip = 15.0 tons/trip
Average Miles Per Trip = 0.02 miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	15.0	15.0	15.0	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities-Table 13.2.1-3

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, E_f =	1.377	0.275	0.0676	lb/mile
Mitigated Emission Factor, E_{ext} =	1.259	0.252	0.0618	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.19	0.04	0.01	0.17	0.03	0.01
Vehicle (leaving plant) (one-way trip)	0.19	0.04	0.01	0.17	0.03	0.01
Totals	0.38	0.08	0.02	0.35	0.07	0.02

Methodology

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

Abbreviations

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

August 4, 2015

Mr. Michael Barnhill
Gator Cases Inc.
2499 S 600 E
Columbia City, IN 46725

Re: Public Notice
Gator Cases Inc.
Permit Level: New Construction MSOP
Permit Number: 183 - 35843 - 00049

Dear Mr. Barnhill:

Enclosed is a copy of your draft New Construction MSOP, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Post & Mail in Columbia City, Indiana publish the abbreviated version of the public notice no later than August 8, 2015. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Peabody Library, 1160 E. SR 205 in Columbia City IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Mehul Sura, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-6868 or dial (317) 233-6868.

Sincerely,
Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter-2014. Dot4/10/14



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Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

August 3, 2015

Post & Mail
Attn: Classifieds
927 W. Connexion Way
Columbia City, Indiana 46725-2002

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Gator Cases Inc., Whitley County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than August 8, 2015.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

Len Pogost

Len Pogost
Permit Branch
Office of Air Quality

Permit Level: New Construction MSOP
Permit Number: 183 - 35843 - 00049

Enclosure
PN Newspaper.dot 6/13/2013



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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100 N. Senate Avenue • Indianapolis, IN 46204

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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

August 4, 2015

To: Peabody Library 1160 E. SR 205 Columbia City IN

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Gator Cases Inc.
Permit Number: 183 - 35843 - 00049

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 6/13/2013



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

Notice of Public Comment

August 4, 2015
Gator Cases Inc.
183 - 35843 - 00049

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.


Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 6/13/13


Mail Code 61-53

IDEM Staff	LPOGOST 8/4/2015 Gator Cases Inc 183 - 35843 - 00049 draft/)			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	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Michael Barnhill Gator Cases Inc 2499 S 600 E Columbia City IN 46725 (Source CAATS)									
2		Mr. Janel Rogers 2050 E Linker Rd Columbia City IN 46725 (Affected Party)									
3		Mr. Nondus Carr 1760 South 500 East Columbia City IN 46725 (Affected Party)									
4		Mr. Thomas E. Delaney 2640 East 400 Columbia City IN 46725 (Affected Party)									
5		Mr. Robert F. Taylor 7856 S 800 E-92 Fort Wayne IN 46814 (Affected Party)									
6		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)									
7		Whitley County Commissioners 220 West Van Buren Street Suite 207 Columbia City IN 46725 (Local Official)									
8		Peabody Library 1160 E. SR 205 Columbia City IN 46725 (Library)									
9		Duane & Deborah Clark Clark Farms 6973 E. 500 S. Columbia City IN 46725 (Affected Party)									
10		Gene Donaghy Northeastern REMC 4901 E. Park 30 Drive Columbia City IN 46725-8790 (Affected Party)									
11		Mr. Lynn Weirick 3954 E Old Trail Rd Columbia City IN 46725 (Affected Party)									
12		Whitley County Health Department 220 West Van Buren Steetr Suite 111 Columbia City IN 46725-2056 (Health Department)									
13		Ms. Camille Amiri News Channel 15 2915 W State Blvd Fort Wayne IN 46808 (Affected Party)									
14		Charles Acheson 4655 S. 700 East Columbia City IN 46725 (Affected Party)									
15		Michael Gayle 1315 S. 500 East Columbia City IN 46725 (Affected Party)									

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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Mail Code 61-53

IDEM Staff	LPOGOST 8/3/2015 Gator Cases Inc 35843 (draft/final)		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	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Columbia City Council Columbia City Council and Mayors Office 112 South Chauncey Street Columbia City IN 46725 (Local Official)									
2		Mr. Jason Morrison SevenGen 604 West Wayne Street Fort Wayne IN 46802 (Consultant)									
3		Shively Warehouse 2540 S 600 E Columbia City IN 46725 (Affected Party)									
4		Essex Group, Inc. 2601 S 600 E Columbia City IN 46725 (Affected Party)									
5		Chroma Properties, LLC 2433 S 600 E Columbia City IN 46725 (Affected Party)									
6		Christ Neidermeyer 6366 E Yellow River Road Columbia City IN 46725 (Affected Party)									
7											
8											
9											
10											
11											
12											
13											
14											
15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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