



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

To: Interested Parties

Date: November 4, 2015

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

Source Name: Dolco Packaging

Permit Level: Administrative Amendment

Permit Number: 001-36352-00032

Source Location: 2110 Patterson Street, Decatur, Indiana

Type of Action Taken: Changes that are administrative in nature

## Notice of Decision: Approval

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

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>  
To view the document, select Search option 3, then enter permit 36352.

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

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

*(continues on next page)*

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

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

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

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

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



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

Jim Baumgartner  
Tekni-Plex, Inc. D.B.A. Dolco Packaging  
2110 Patterson Street  
Decatur, IN, 46733

November 4, 2015

Re: 001-36352-00032  
Administrative Amendment to  
Part 70 No.: 001-30927-00032

Dear Jim Baumgartner:

Dolco Packaging was issued a Part 70 Permit No. 001-30927-00032 on December 29, 2011 for a stationary polystyrene extrusion plant located at 2110 Patterson Street, Decatur, Indiana 46733. On October 2, 2015, the Office of Air Quality (OAQ) received an application from the source requesting to add one (1) offset printer, including an increased ink and cleaning solvent throughput and one (1) thermoformer.

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

Pursuant to 326 IAC 2-7-11(a)(8)(A), this change to the permit is considered an administrative amendment because the permit is amended to incorporate exempt units as described in 326 IAC 2-1.1-3 that does not otherwise constitute a modification for purposes of 326 IAC 2-7-10.5 (Source Modifications) or 326 IAC 2-7-12 (Permit Modifications).

See Appendix A for the potential to emit of the exempted emissions units.

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

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions on this matter, please contact Monica Dick of my staff, at 317-234-1243 or 1-800-451-6027, and ask for extension 4-1243.

Sincerely,

Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Updated Permit, Technical Support Document and Appendix A

cc: File - Adams County  
Adams County Health Department  
U.S. EPA, Region 5  
Compliance and Enforcement Branch





# 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

Carol S. Comer  
Commissioner

## Part 70 Operating Permit OFFICE OF AIR QUALITY

**Dolco Packaging  
2110 Patterson Street  
Decatur, Indiana 46733**

(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.

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T001-30927-00032	
Issued by: Original Signed Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 29, 2011  Expiration Date: December 29, 2016

Administrative Amendment No.: 001-36352-00032	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 4, 2015  Expiration Date: December 29, 2016

## TABLE OF CONTENTS

<b>SECTION A</b>	<b>SOURCE SUMMARY .....</b>	<b>4</b>
A.1	General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(14)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]	
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	
<b>SECTION B</b>	<b>GENERAL CONDITIONS.....</b>	<b>7</b>
B.1	Definitions [326 IAC 2-7-1]	
B.2	Revocation of Permits [326 IAC 2-1.1-9(5)]	
B.3	Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]	
B.4	Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]	
B.5	Term of Conditions [326 IAC 2-1.1-9.5]	
B.6	Enforceability [326 IAC 2-7-7] [IC 13-17-12]	
B.7	Severability [326 IAC 2-7-5(5)]	
B.8	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.9	Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.10	Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]	
B.11	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.12	Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]	
B.13	Emergency Provisions [326 IAC 2-7-16]	
B.14	Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]	
B.15	Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]	
B.16	Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]	
B.17	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]	
B.18	Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]	
B.19	Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]	
B.20	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]	
B.21	Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]	
B.22	Source Modification Requirement [326 IAC 2-7-10.5]	
B.23	Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]	
B.24	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.25	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]	
B.26	Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]	
<b>SECTION C</b>	<b>SOURCE OPERATION CONDITIONS.....</b>	<b>18</b>
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)] .....</b>	<b>18</b>
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	

<b>Testing Requirements [326 IAC 2-7-6(1)]</b> .....	<b>20</b>
C.9 Performance Testing [326 IAC 3-6]	
<b>Compliance Requirements [326 IAC 2-1.1-11]</b> .....	<b>20</b>
C.10 Compliance Requirements [326 IAC 2-1.1-11]	
<b>Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]</b> .....	<b>20</b>
C.11 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]	
C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]	
<b>Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]</b> .....	<b>21</b>
C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]	
C.14 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]	
C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]	
C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]	
<b>Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]</b> .....	<b>23</b>
C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]	
C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]	
C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]	
<b>Stratospheric Ozone Protection</b> .....	<b>25</b>
C.20 Compliance with 40 CFR 82 and 326 IAC 22-1	
<b>SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS</b> .....	<b>26</b>
<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b> .....	<b>26</b>
D.1.1 Prevention of Significant Deterioration [326 IAC 2-2]	
D.1.2 VOC Emissions [326 IAC 8-1-6]	
D.1.3 Particulate [326 IAC 6-3-2]	
D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]	
<b>Compliance Determination Requirements</b> .....	<b>27</b>
D.1.5 Particulate Control	
D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]	
<b>Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]</b> .....	<b>28</b>
D.1.7 Thermal Oxidizer Temperature	
D.1.8 Parametric Monitoring	
D.1.9 Visible Emissions Notations	
D.1.10 Parametric Monitoring	
D.1.11 Broken or Failed Bag Detection	
<b>Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]</b> .....	<b>30</b>
D.1.12 Record Keeping Requirement	
D.1.13 Reporting Requirements	
<b>CERTIFICATION</b> .....	<b>32</b>
<b>EMERGENCY OCCURRENCE REPORT</b> .....	<b>33</b>
<b>Part 70 Quarterly Report</b> .....	<b>35</b>
<b>Part 70 Quarterly Report</b> .....	<b>36</b>
<b>QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT</b> .....	<b>37</b>
<b>Affidavit of Construction</b> .....	<b>39</b>

## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

---

The Permittee owns and operates a stationary polystyrene extrusion plant.

Source Address:	2110 Patterson Street, Decatur, Indiana 46733
General Source Phone Number:	(260) 728-2161
SIC Code:	3086 (Plastics Foam Products)
County Location:	Adams
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(14)]

---

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

- (a) One (1) polystyrene food packaging production line, modified in 2010, approved in 2015 for modification to add one (1) thermoformer, consisting of the following:
  - (1) One (1) curing room, constructed in 1997, equipped with one (1) natural gas fired regenerative thermal oxidizer, constructed in 1998, with a maximum capacity of five (5) million British thermal units per hour.
  - (2) Four (4) polystyrene foam extruders, constructed in 1972, with VOC emissions controlled by a thermal oxidizer (constructed in 1998), with maximum capacities included in a confidential file.
  - (3) Eleven (11) underpress grinders, located under the thermoformers, for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse, with VOC and particulate emissions directed to silo baghouses which vent to a regenerative thermal oxidizer (RTO) for control.
  - (4) Eleven (11) thermoformers, with VOC and particulate emissions directed to silo baghouses which vent to a regenerative thermal oxidizer (RTO) for control.
  - (5) One (1) polystyrene foam extruder, identified as E-5, approved in 2011 for construction, equipped with an inlet butane gas flow monitor, with a maximum capacity based on butane gas allocation, and with VOC emissions controlled by a thermal oxidizer (constructed in 1998).
- (b) Ten (10) offset printers, with a maximum capacity oil based coldset ink usage of 10,400 pounds per year, 0.01% VOC content UV-curable ink of 39,000 pounds per year, and 14,400 gallons per year of solvent consisting of the following:

- (1) Eight (8) offset printers, constructed in 1972,
- (2) one (1) offset printer, constructed in 2010, and
- (3) one (1) offset printer, approved in 2015 for construction.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]

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

- (a) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (b) Enclosed systems for conveying plastic raw materials and plastic finished goods.
- (c) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (d) Gasoline generators not exceeding 110 horsepower.
- (e) Stationary fire pumps.
- (f) Emission units with PM and PM10 emissions less than five (5) tons per year, SO<sub>2</sub>, NO<sub>x</sub>, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and five-tenths (2.5) tons per year:
  - (1) One (1) butane compressed gas storage tank A, installed in 1990, with a capacity of 15,000 gallons.
  - (2) One (1) idle gas storage tank B, installed in 1972, with a capacity of 7,000 gallons, charged with nitrogen to inhibit corrosion.
  - (3) Five (5) extruder feed containers for talc.
  - (4) Five (5) extruder feed containers for colorator.
  - (5) Eight (8) day tanks for material handling and transfer.
  - (6) Nine (9) silos for regrind flake recycling, constructed in 1972, with maximum capacities included in a confidential file, each equipped with a baghouse to control particulate emissions.
  - (7) Cured rollstock operations associated with processing of polystyrene foam shipped from outside.
  - (8) Repelletizer installed in 1994, with a capacity of 500 lbs/hr.

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);

- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B GENERAL CONDITIONS**

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

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

### **B.2 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 proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin 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 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]**

- (a) This permit, T001-30927-00032, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

---

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

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

---

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 [326 IAC 2-7-5(6)(D)]**

---

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

**B.9 Duty to Provide Information [326 IAC 2-7-5(6)(E)]**

---

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

**B.10 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]**

---

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
  - (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and
  - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

**B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]**

---

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

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

and

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

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

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

**B.12 Preventive Maintenance Plan [326 IAC 2-7-5(12)][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 PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

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

#### B.13 Emergency Provisions [326 IAC 2-7-16]

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality,  
Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865

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

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

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

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

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

**B.14 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]**

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]**

---

- (a) All terms and conditions of permits established prior to T001-30927-00032 and issued pursuant to permitting programs approved into the state implementation plan have been either:

- (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

**B.16 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]**

---

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]**

---

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar

approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.21 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]**

---

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

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

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

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

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and

- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.22 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.23 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

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

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

B.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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

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

C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A. The provisions of 326 IAC 6-5 are not federally enforceable.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

#### **C.9 Performance Testing [326 IAC 3-6]**

---

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

#### **C.10 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 2-7-5(1)][326 IAC 2-7-6(1)]**

#### **C.11 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]**

---

- (a) For new units:  
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:  
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of

permit issuance to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval 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 180 days from the date on which this source commences operation.

The ERP does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]

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

C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

**C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:
  - (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the Part 70 permit.Records of required monitoring information include the following, where applicable:
  - (AA) The date, place, as defined in this permit, and time of sampling or

measurements.

- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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

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

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## **Stratospheric Ozone Protection**

### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

---

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) polystyrene food packaging production line, modified in 2010, approved in 2015 for modification to add one (1) thermoformer, consisting of the following:
- (1) One (1) curing room, constructed in 1997, equipped with one (1) natural gas fired regenerative thermal oxidizer, constructed in 1998, with a maximum capacity of five (5) million British thermal units per hour.
  - (2) Four (4) polystyrene foam extruders, constructed in 1972, with VOC emissions controlled by a thermal oxidizer (constructed in 1998), with maximum capacities included in a confidential file.
  - (3) Eleven (11) underpress grinders, located under the thermoformers, for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse, with VOC and particulate emissions directed to silo baghouses which vent to a regenerative thermal oxidizer (RTO) for control.
  - (4) Eleven (11) thermoformers, with VOC and particulate emissions directed to silo baghouses which vent to a regenerative thermal oxidizer (RTO) for control.
  - (5) One (1) polystyrene foam extruder, identified as E-5, approved in 2011 for construction, equipped with an inlet butane gas flow monitor, with a maximum capacity based on butane gas allocation, and with VOC emissions controlled by a thermal oxidizer (constructed in 1998).

### Insignificant Activities

- (6) Nine (9) silos for regrind flake recycling, constructed in 1972, with maximum capacities included in a confidential file, each equipped with a baghouse to control particulate emissions.

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

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

#### D.1.1 Prevention of Significant Deterioration [326 IAC 2-2]

In order to render 326 IAC 2-2 not applicable to this polystyrene foam extrusion process, the following shall apply:

- (a) The input of butane as a VOC blowing agent to the polystyrene food packaging production line shall not exceed 754.2 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The VOC emission factors shall not exceed the following:
  - Curing - 13.15 lb VOC/100 lb butane used
  - Storage - 4.86 lb VOC/100 lb butane used
  - Regrind storage silos - 1.41 lb VOC/100 lb butane used
  - Extruders - 4.5 lb VOC/100 lb butane
  - Thermoforming building area - 1.53 lb VOC/100 lb butane

Thermoforming waste grinders - 15.63 lb VOC/100 lb butane  
Extruder waste grinders - 3.15 lb VOC/100 lb butane used  
Finished product storage - 10.02 lb VOC/100 lb butane used

- (c) The Permittee shall operate the thermal oxidizer, with a minimum destruction efficiency of 97% and capture efficiency of 100% for curing room emissions, 100% for the thermoforming waste grinders, 100% for extruder waste grinders, and 100% for the storage silos at all times that any of the associated processes are in operation.

Compliance with these limitations shall ensure that the emissions of VOC from the extrusion process, in conjunction with VOC emissions from insignificant activities at this source stay below 250 tons per year, rendering 326 IAC 2-2 not applicable.

#### D.1.2 VOC Emissions [326 IAC 8-1-6]

---

In order to render 326 IAC 8-1-6 not applicable, the following shall apply:

- (a) The input of butane as a VOC blowing agent to the extruder identified as E-5 shall not exceed 151.0 tons per twelve consecutive month period, with compliance determined at the end of each month.
- (b) The VOC emission factor for the extruder identified as E-5 shall not exceed 4.5 lb VOC/100 lb butane.

Compliance with this limit shall ensure that the VOC emissions from this extruder (E-5) remains below twenty-five (25) tons per twelve (12) consecutive month period, rendering the requirements of 326 IAC 8-1-6 not applicable.

#### D.1.3 Particulate [326 IAC 6-3-2]

---

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the polystyrene food packaging production line, including the nine (9) silos and the final product storage operations, shall be limited to a total of 8.56 pounds per hour when operating at a total process weight rate of 3.0 tons per hour. This limit was calculated by the following:

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

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

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

---

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

### Compliance Determination Requirements

#### D.1.5 Particulate Control

---

- (a) In order to comply with condition D.1.3, the nine (9) baghouses and RTO pre-filter for particulate control shall be in operation and control emissions from the polystyrene food packaging production line at all times that the polystyrene food packaging production line 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.

#### D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

---

In order to demonstrate compliance with Conditions D.1.1(b) and D.1.2, not later than 180 days of the issuance of this permit or initial startup of the extruder identified as E-5, whichever is later, the Permittee shall perform VOC testing utilizing methods as approved by the Commissioner. This test shall be conducted on the thermal oxidizer while all units associated with the one (1) polystyrene food packaging production line are in operation to determine or verify the following capture efficiencies:

- 100% for curing room emissions,
- 100% for the thermoforming waste grinders,
- 100% for the extruder waste grinders, and
- 100% for the storage silos.

The test shall also verify a minimum destruction efficiency of 97% for the thermal oxidizer.

This test shall be repeated at least once every five (5) years from the date of the latest valid compliance demonstration.

Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

#### D.1.7 Thermal Oxidizer Temperature

---

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purposes of this condition, continuous monitoring shall mean no less often than once per fifteen (15) minutes. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps whenever the hourly average temperature of the thermal oxidizer is below 1400°F. An hourly average temperature that is below 1400°F is not a deviation from this permit. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with condition D.1.1 as approved by IDEM.
- (c) If the primary continuous monitoring system is not in operation, the oxidizer temperature will be recorded using some manner of secondary system, such as with back-up electro-mechanical hardware or manually if necessary. Nothing in this permit shall excuse the Permittee from complying with the requirement to continuously monitor the temperature of the thermal oxidizer. Continuous monitoring shall mean no less often than once per fifteen (15) minutes.
- (d) The oxidizer shall operate such that if the hourly average temperature falls below the one (1) hour block average minimum required temperature (setpoint) as determined by the latest stack test, reasonable response steps shall be taken to return oxidizer temperature to at least the required minimum temperature setpoint. Reasonable response steps must return the oxidizer temperature to or above the minimum temperature setpoint within one (1) hour of the corrective action, or the polystyrene food packaging production line shall

be shut off. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps or failure to shut off the polystyrene food packaging production line as stated above shall be considered a deviation from this permit.

#### D.1.8 Parametric Monitoring

---

- (a) The Permittee shall determine the RTO fan Hertz from the most recent valid stack test that demonstrates compliance with Conditions D.1.1 and D.1.2, as approved by IDEM.
- (b) The RTO fan Hertz shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the fan Hertz is outside the normal range of 41 to 43 Hertz or the range as established in the most recent compliant stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances, contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit
- (c) The instrument used for determining the butane gas flow input to extruder E-5 shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### D.1.9 Visible Emissions Notations

---

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

#### D.1.10 Parametric Monitoring

---

The Permittee shall record the pressure drop across pre-filter for the thermal oxidizer used in conjunction with the polystyrene food packaging production line, at least three (3) times per day when the process is in operation. When for any one reading, the pressure drop across the pre-filter is outside the normal range of 1.0 and 3.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### D.1.11 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 line. 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's 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 2-7-5(3)] [326 IAC 2-7-19]**

#### D.1.12 Record Keeping Requirement

---

- (a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall:
  - (1) Maintain monthly records of the input of butane as a blowing agent to the (5) extruder lines through material purchase records and volumetric measurements of the butane tank.
  - (2) Provide and maintain documentation supporting all of the VOC emission factors for the curing, storage, extrusion, thermoforming, and regrinding operations.
- (b) To document the compliance status with Condition D.1.7, the Permittee shall maintain the continuous temperature records (on an hourly average basis) for the regenerative thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliance stack test.
- (c) To document the compliance status with Condition D.1.8, the Permittee shall maintain daily records of the RTO fan Hertz.
- (d) To document the compliance status with Condition D.1.9, the Permittee shall maintain records of once per day visible emission notations of each of the baghouse stack exhausts when exhausting directly to the atmosphere. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day or did not exhaust directly to the atmosphere).
- (e) To document the compliance status with Condition D.1.10, the Permittee shall maintain once per day records of the pressure drop across the pre-filter for the thermal oxidizer. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

- (f) Section C - General Record Keeping Requirements, contains the Permittee's obligations with regard to the records required by this condition.

#### D.1.13 Reporting Requirements

---

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require the certification that meets the requirements of 326 IAC 2-7-6(1) by the "responsible official," as defined by 326 IAC 2-7-1 (34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Dolco Packaging  
Source Address: 2110 Patterson Street, Decatur, Indiana 46733  
Part 70 Permit No.: T001-30927-00032

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT**  
**EMERGENCY OCCURRENCE REPORT**

Source Name: Dolco Packaging  
Source Address: 2110 Patterson Street, Decatur, Indiana 46733  
Part 70 Permit No.: T001-30927-00032

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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

**Page 2 of 2**

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

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

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

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

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

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

**Part 70 Quarterly Report**

Source Name: Dolco Packaging  
Source Address: 2110 Patterson Street, Decatur, Indiana 46733  
Part 70 Permit No.: T001-30927-00032  
Facility: Polystyrene food packaging production line  
Parameter: Source-wide butane blowing agent input  
Limit: The input of butane as a blowing agent shall be less than 754.2 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER :

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

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

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

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

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

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

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

**Part 70 Quarterly Report**

Source Name: Dolco Packaging  
Source Address: 2110 Patterson Street, Decatur, Indiana 46733  
Part 70 Permit No.: T001-30927-00032  
Facility: Extruder installed in 2011  
Parameter: Butane blowing agent input  
Limit: The input of butane as a blowing agent shall be less than 151 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER :

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

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

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

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

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

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

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

Source Name: Dolco Packaging  
Source Address: 2110 Patterson Street, Decatur, Indiana 46733  
Part 70 Permit No.: T001-30927-00032

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

Page 1 of 2

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

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

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

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

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

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

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

Dolco Packaging  
2110 Patterson Street  
Decatur, Indiana 46733

### 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 Dolco Packaging 2110 Patterson Street, Decatur, Indiana 46733, completed construction of the polystyrene foam extruder on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on September 15, 2011 and as permitted pursuant to New Source Construction Permit and Part 70 Operating Permit No. T001-30927-00032, Plant ID No. 001-00032 issued on \_\_\_\_\_.

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 Part 70 Administrative  
Amendment**

**Source Description and Location**

Source Name:	Dolco Packaging
Source Location:	2110 Patterson Street, Decatur, Indiana 46733
County:	Adams
SIC Code:	3086 (Plastics Foam Products)
Operation Permit No.:	T001-30927-00032
Operation Permit Issuance Date:	December 29, 2011
Administrative Amendment No.:	001-36352-00032
Permit Reviewer:	Monica Dick

On October 2, 2015, the Office of Air Quality (OAQ) received an application from Dolco Packaging related to administrative changes to an existing polystyrene extrusion plant.

**Existing Approvals**

The source was issued Part 70 Operating Permit No. 001-30927-00032 on December 29, 2011. There have been no subsequent approvals issued.

**County Attainment Status**

The source is located in Adams County:

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

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

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Adams County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
Adams County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (c) Other Criteria Pollutants  
Adams County has been classified as attainment or unclassifiable in Indiana for SO<sub>2</sub>, CO, PM<sub>10</sub>, NO<sub>2</sub>, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Fugitive Emissions

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

### Source Status - Existing Source

The table below is from the TSD of permit 001-30927-00032, issued on December 29, 2011 and summarizes the potential to emit of the entire source, prior to the proposed amendment, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (ton/yr)
PM	21.18
PM <sub>10</sub>	21.18
PM <sub>2.5</sub>	21.18
SO <sub>2</sub>	Negligible
VOC	173.82
CO	3.00
CO <sub>2e</sub>	4,373
NO <sub>x</sub>	3.60
Single HAP	<10
Combination HAPs	<25

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
- (c) On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146\\_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States

Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

#### Description of Proposed Amendment

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Dolco Packaging on October 2, 2015, relating to the addition of one (1) printer, including an increased ink and cleaning solvent throughput and one (1) thermoformer. The following is a list of the proposed emission units:

- (a) One (1) polystyrene food packaging production line, **modified in 2010, approved in 2015 for modification to add one (1) thermoformer**, consisting of the following:

\*\*\*

- (3) **Eleven (11) underpress grinders**, located under the thermoformers, for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse, with VOC and particulate emissions directed to silo baghouses which vent to a regenerative thermal oxidizer (RTO) for control.
- (4) ~~One (1) underpress grinder and~~ **Eleven (11) thermoformers** ~~for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse, approved for construction 2008,~~ with VOC and particulate emissions directed to silo baghouses which vent to a regenerative thermal oxidizer (RTO) for control.

\*\*\*

- (b) **Ten (10) offset printers, with a combined maximum capacity oil based coldset ink usage of 10,400 pounds per year, 0.01% VOC content UV-curable ink of 39,000 pounds per year, and 14,400 gallons per year of solvent, consisting of the following:**

- (1) Eight (8) offset printers, constructed in 1972, and
- (2) ~~one (1) offset printer, approved for construction~~ **constructed in 2010** ~~2008, with a combined estimated maximum ink usage of 38,000 pounds per year of ultraviolet light-activated and oil based inks., and~~
- (3) **one (1) offset printer, approved in 2015 for construction.**

#### Enforcement Issues

There are no pending enforcement actions.

#### Emission Calculations

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

#### Permit Level Determination – Part 70 Amendment to an Existing Source

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

<b>PTE Before Controls of the Amendment*</b>			
<b>Pollutant</b>	<b>Existing: Nine (9) Offset Printers Potential To Emit (ton/yr)</b>	<b>Modified: Ten (10) Offset Printers Potential To Emit (ton/yr)</b>	<b>Potential To Emit (ton/yr)</b>
PM	-	-	-
PM <sub>10</sub>	-	-	-
PM <sub>2.5</sub>	-	-	-
SO <sub>2</sub>	-	-	-
VOC	7.97	9.78	1.55
CO	-	-	-
NO <sub>x</sub>	-	-	-
Single HAPs	-	-	-
Total HAPs	-	-	-

\*The amendment PTE is the difference between the modified and existing emission totals of the printers.

Appendix A of this TSD reflects the unrestricted potential emissions of the amendment.

There is no increase in the potential to emit of any regulated pollutants associated with the one (1) thermoformer and the existing permit limits will not change.

This amendment is not subject to the source modification requirements under 326 IAC 2-7-10.5, because the proposed amendment has a potential to emit of VOC below the range of greater than ten (10) tons per year and Less than twenty-five (25) tons per year listed in 326 IAC 2-7-10.5(e)(1)(B).

The changes will be incorporated into the permit as an Administrative Amendment under 326 IAC 2-7-11, because the permit is amended to incorporate exempt units as described in 326 IAC 2-1.1-3 that does not otherwise constitute a modification for purposes of 326 IAC 2-7-10.5 (Source Modifications) or 326 IAC 2-7-12 (Permit Modifications).

<b>Permit Level Determination – PSD</b>
---

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 administrative amendment, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process / Emission Unit	Project Emissions (ton/yr)							
	PM	PM <sub>10</sub>	PM <sub>2.5</sub> *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs
Printing	-	-	-	-	-	9.78	-	-
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA

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

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

Process / Emission Unit	PTE of the Source After the Amendment (ton/yr)							
	PM	PM <sub>10</sub>	PM <sub>2.5</sub> *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs
Polystyrene Manufacturing Process	21.08 (b)	21.08 (b)	21.08 (b)	-	-	165.65 (a)	-	0.40
Thermal Oxidizer and Heater Natural Gas Combustion	<del>0.10</del> <b>0.07</b>	<del>0.30</del> <b>0.27</b>	<del>0.30</del> <b>0.27</b>	<del>0.00</del> <b>0.02</b>	<del>3.60</del> <b>3.55</b>	0.20	<del>3.00</del> <b>2.98</b>	<del>0.00</del> <b>0.07</b>
Printing	-	-	-	-	-	<del>7.97</del> <b>9.78</b>	-	-
<b>Source Total</b>	<del>21.18</del> <b>21.15</b>	<del>21.38</del> <b>21.35</b>	<del>21.38</del> <b>21.35</b>	<del>0.00</del> <b>0.02</b>	<del>3.60</del> <b>3.55</b>	<del>173.82</del> <b>175.63</b>	<del>3.00</del> <b>2.98</b>	<del>0.40</del> <b>0.47</b>
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA

\*PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.  
 (a) Limited to render 326 IAC 2-2 (PSD) not applicable.  
 (b) PTE after control

The table below summarizes the potential to emit of the entire source after issuance of this amendment, reflecting all limits, of the emission units. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted).

Process / Emission Unit	PTE of the Entire Source After the Amendment (ton/yr)							
	PM	PM <sub>10</sub>	PM <sub>2.5</sub> *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs
Polystyrene Manufacturing Process	21.08 (b)	21.08 (b)	21.08 (b)	-	-	165.65 (a)	-	0.40
Thermal Oxidizer and Heater Natural Gas Combustion	0.07	0.27	0.27	0.02	3.55	0.20	2.98	0.07
Printing	-	-	-	-	-	9.78	-	-
<b>Source Total</b>	<b>21.15</b>	<b>21.35</b>	<b>21.35</b>	<b>0.02</b>	<b>3.55</b>	<b>175.63</b>	<b>2.98</b>	<b>0.47</b>
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA

\*PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.  
 (a) Limited to render 326 IAC 2-2 (PSD) not applicable.  
 (b) PTE after control

This amendment to an existing minor PSD stationary source is not major because the emissions increase of each PSD regulated pollutant are less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

The table includes a revision to the thermal oxidizer and heater natural gas combustion PTE, because the AP 42, Chapter 1.4 emission factor conversion from lb/10<sup>6</sup> scf to lb/MMBtu is divided by 1,020.

The source will remain a minor PSD stationary source after issuance of this amendment.

#### **Federal Rule Applicability Determination**

No new federal rules have become applicable due to the proposed amendment.

#### **State Rule Applicability Determination**

The following state rules are applicable to the source due to the amendment:

##### **326 IAC 2-2 (PSD)**

PSD applicability is discussed under the Permit Level Determination – PSD section.

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

The operation of the one (1) offset printer and one (1) thermoformer will each emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

#### **State Rule Applicability Determination - Offset Printer and Cleaning Solvent**

##### **326 IAC 8-6 Organic Solvent Emission Limitations**

Pursuant to 326 IAC 8-6-1(2), the one (1) offset printer and cleaning solvent is not subject to the requirements of 326 IAC 8-6, because the source is located in Adams County, was constructed prior to October 7, 1974 and modified after January 1, 1980. Therefore, 326 IAC 8-6 does not apply.

##### **326 IAC 8-16 Offset Lithographic Printing and Letterpress Printing**

Pursuant to 326 IAC 8-16-1(a), the one (1) offset printer and cleaning solvent is not subject to the requirements of 326 IAC 8-16, because this rule applies to sources in lake and Porter County. The source is located in Adams County. Therefore, 326 IAC 8-16 does not apply.

##### **326 IAC 8-17 Industrial Solvent Cleaning Operations**

Pursuant to 326 IAC 8-17-1(a)(1), the one (1) offset printer and cleaning solvent is not subject to the requirements of 326 IAC 8-17, because this rule applies to sources in lake and Porter County. The source is located in Adams County. Therefore, 326 IAC 8-17 does not apply.

##### **326 IAC 8-1-6 New facilities; general reduction requirements**

Pursuant to 326 IAC 8-1-6(1) the one (1) offset printer and cleaning solvent is not subject to the requirements of best available control technology (BACT), because the potential emissions of are less than twenty-five (25) tons per year of VOC. Therefore, 326 IAC 8-1-6 does not apply.

#### **State Rule Applicability Determination - Thermoformer**

##### **326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the polystyrene food packaging production line, including the nine (9) silos and the final product storage operations shall not exceed 8.56 pounds per hour when operating at a process weight rate of 3.0 tons per hour. The pound per hour limitation was calculated with the following equation:

- (a) 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:

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

The nine (9) baghouses and RTO pre-filter for particulate control shall be in operation at all times the polystyrene food packaging production line is in operation, in order to comply with this limit.

There will be no change to the existing requirements.

### Compliance Determination and Monitoring Requirements

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

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

The existing compliance requirements will not change as a result of this amendment. The source shall continue to comply with the applicable requirements and permit conditions as contained in the Part 70 No: 001-30927-00032 on December 29, 2011. The existing testing requirements will not change as a result of this amendment.

### Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 001-30927-00032. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

- (a) The descriptions have been revised to include the new equipment in Condition A.2 and Section D.1. Additionally IDEM added the nine (9) silos for regrind flake recycling to the Section D.1 emission unit description, because requirements are included in the Section D.1 conditions. The changes made are as follows:

\*\*\*

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)(14)]

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

- (a) One (1) polystyrene food packaging production line, **modified in 2010, approved in 2015 for modification to add one (1) thermoformer**, consisting of the following:

\*\*\*

- (3) **Eleven (11) u**nderpress grinders, located under the thermoformers, for the grinding of scrap from the thermoforming process as the scrap is processed in

preparation for reuse, with VOC and particulate emissions directed to silo baghouses which vent to a regenerative thermal oxidizer (RTO) for control.

- (4) ~~One (1) underpress grinder and~~ **Eleven (11)** thermoformers for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse, approved for construction 2008, with VOC and particulate emissions directed to silo baghouses which vent to a regenerative thermal oxidizer (RTO) for control.

\*\*\*

- (b) **Ten (10) offset printers, with a combined maximum capacity oil based coldset ink usage of 10,400 pounds per year, 0.01% VOC content UV-curable ink of 39,000 pounds per year, and 14,400 gallons per year of solvent, consisting of the following:**

- (1) Eight (8) offset printers, constructed in 1972, and
- (2) one (1) offset printer, ~~approved for construction~~ **constructed in 2010**2008, with a combined estimated maximum ink usage of 38,000 pounds per year of ultraviolet light-activated and oil based inks., and
- (3) **one (1) offset printer, approved in 2015 for construction.**

\*\*\*

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

##### Emissions Unit Description:

- (a) One (1) polystyrene food packaging production line, **modified in 2010, approved in 2015 for modification to add one (1) thermoformer**, consisting of the following:
- (1) One (1) curing room, constructed in 1997, equipped with one (1) natural gas fired regenerative thermal oxidizer, constructed in 1998, with a maximum capacity of five (5) million British thermal units per hour.
- (2) Four (4) polystyrene foam extruders, constructed in 1972, with VOC emissions controlled by a thermal oxidizer (constructed in 1998), with maximum capacities included in a confidential file.
- (3) **Eleven (11)** ~~u~~nderpress grinders, located under the thermoformers, for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse, with VOC and particulate emissions directed to silo baghouses which vent to a regenerative thermal oxidizer (RTO) for control.
- (4) ~~One (1) underpress grinder and~~ **Eleven (11)** thermoformers for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse, approved for construction 2008, with VOC and particulate emissions directed to silo baghouses which vent to a regenerative thermal oxidizer (RTO) for control.
- (5) One (1) polystyrene foam extruder, identified as E-5, approved in 2011 for construction, equipped with an inlet butane gas flow monitor, with a maximum capacity based on butane gas allocation, and with VOC emissions controlled by a thermal oxidizer (constructed in 1998).

##### Insignificant Activities

<b>(6) Nine (9) silos for regrind flake recycling, constructed in 1972, with maximum capacities included in a confidential file, each equipped with a baghouse to control particulate emissions.</b>
(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

\*\*\*

### Additional Changes

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

**Change 1:** IDEM is including the standard industrial classification title in Condition A.1 as follows:

\*\*\*

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary polystyrene extrusion plant.

Source Address: 2110 Patterson Street, Decatur, Indiana 46733  
General Source Phone Number: (260) 728-2161  
SIC Code: 3086 **(Plastics Foam Products)**

\*\*\*

**Change 2:** On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlining provisions. The change is only to site of these rules in Section A - Specifically Regulated Insignificant Activities, Section B - Preventative Maintenance Plan, Section B - Emergency Provisions, Section B - Operational Flexibility, Section C - Risk Management Plan, and Section D - Preventative Maintenance Plan.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] 326 IAC 2-7-5(14) (15)]

\*\*\*

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13) (12)] [326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

\*\*\*

B.13 Emergency Provisions [326 IAC 2-7-16]

\*\*\*

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) **(8)** be revised in response to an emergency.

\*\*\*

B.21 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

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

\*\*\*

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which

document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), ~~or (c), or (e)~~. The Permittee shall make such records available, upon reasonable request, for public review.

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

\*\*\*

C.14 Risk Management Plan [326 IAC 2-7-5(~~1142~~)] [40 CFR 68]

---

\*\*\*

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(~~1243~~)]

---

\*\*\*

**Change 3:** IDEM is changing the Section C Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

---

(a) **For new units:**  
**Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.**

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

**Change 4:** IDEM clarified the following condition to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

---

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than

twenty percent (20%) of full scale. **The analog instrument shall be capable of measuring values outside of the normal range.**

\*\*\*

**Change 5:** IDEM, OAQ has clarified the Permittee's responsibility with regards to record keeping.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

---

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

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the Part 70 permit.

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

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

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

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

**Change 6:** IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

---

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. **Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph.** Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

\*\*\*

**Change 7:** IDEM, OAQ has clarified the parameter being measure as fan speed, which corresponds

to the frequency being measured in Hertz, rather than ampere. The change is as follows:

#### D.1.8 Parametric Monitoring

- (a) The Permittee shall determine the RTO fan Hertz from the most recent valid stack test that demonstrates compliance with Conditions D.1.1 and D.1.2, as approved by IDEM.
- (b) The RTO fan Hertz shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the fan ~~ampere~~ **Hertz** is outside the normal range of 41 to 43 Hertz or the range as established in the most recent compliant stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances, contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit

\*\*\*

### Conclusion and Recommendation

The construction of this proposed amendment shall be subject to the conditions of the attached proposed Part 70 Administrative Amendment No. 001-36352-00032. The staff recommend to the Commissioner that this Part 70 Administrative Amendment be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Monica Dick at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-1243 or toll free at 1-800-451-6027 extension 4-1243.
- (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>.

**TSD Appendix A: Emission Calculations**

**Summary - Emissions Calculations**

**Company Name:** Dolco Packaging  
**Address City IN Zip:** 2110 Patterson Street, Decatur, IN 46733  
**Permit Number:** 001-36352-00032  
**Reviewer:** Monica Dick

**Unrestricted Potential Emissions (tons/year)**

Emissions Generating Activity				
Pollutant	Polystyrene Manufacturing Process	Thermal Oxidizer and Heater Natural Gas Combustion	Printing	TOTAL
PM	2,108.41	0.07	0.00	2,108.47
PM10	2,108.41	0.27	0.00	2,108.68
Direct PM2.5	2,108.41	0.27	0.00	2,108.70
SO2	0.00	0.02	0.00	0.02
NOx	0.00	3.55	0.00	3.55
VOC	409.18	0.20	9.78	419.15
CO	0.00	2.98	0.00	2.98
total HAPs	0.40	0.07	0.00	0.46
worst case single HAP	0.37 Styrene	0.06 Hexane	0.00	0.37 Styrene
Total emissions based on rated capacity at 8,760 hours/year.				
Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Polystyrene Manufacturing Process	Thermal Oxidizer and Heater Natural Gas Combustion	Printing	TOTAL
PM	21.08	0.07	0.00	21.15
PM10	21.08	0.27	0.00	21.35
Direct PM2.5	21.08	0.27	0.00	21.35
SO2	0.00	0.02	0.00	0.02
NOx	0.00	3.55	0.00	3.55
VOC	165.65	0.20	9.78	175.63
CO	0.00	2.98	0.00	2.98
total HAPs	0.40	0.07	0.00	0.46
worst case single HAP	0.37 Styrene	0.06 Hexane	0.00	0.37 Styrene
Total emissions based on rated capacity at 8,760 hours/year, after control.				
For VOC/HAP emissions, see detailed calculations in Polystyrene - resin table.				

**Appendix A: Emission Calculations**

**Company Name:** Dolco Packaging  
**Address City IN Zip:** 2110 Patterson Street, Decatur, IN 46733  
**Permit Number:** 001-36352-00032  
**Reviewer:** Monica Dick

**Polystyrene Manufacturing - Virgin Polystyrene**

Limit of material usage before control:

Polystyrene (Virgin + recycled) Maximum = 21,005.60 tons/yr  
 Butane Maximum Allowable Usage = 754.24 tons/yr  
 Maximum Resin Usage (virgin polystyrene)= 14,135.00 tons/yr (Note: recycled polystyrene has no VOC/HAP emissions)  
 73% of polystyrene used is virgin

Emitted Into:	Gas Allocation Percentage	Limited Tons per year VOC in this area Before Control	Percent Capture	Percent Destruction Efficiency of TO	Tons Per Year VOC Destroyed	Tons Per Year VOC Emitted
Curing Operation - curing room <sup>a</sup>	13.15%	99.18	100.0%	97.0%	96.21	2.98
Curing Operation - outside storage <sup>a</sup>	4.86%	36.66	0.0%	0.0%	0.00	36.66
Regrind Storage Silos	1.41%	10.63	100.0%	97.0%	10.32	0.32
Extruder Building Area - 5 extruders	4.50%	33.94	0.0%	0.0%	0.00	33.94
Thermoforming Building Area	1.53%	11.54	0.0%	0.0%	0.00	11.54
Thermoforming Waste Grinders	15.63%	117.89	100.0%	97.0%	114.35	3.54
Extruder Waste Grinders	3.15%	23.76	100.0%	97.0%	23.05	0.71
Finished Product Storage	10.02%	75.57	0.0%	0.0%	0.00	75.57
Retained in Product	45.75%	345.06	NA	NA	NA	NA
<b>Limited VOC Emissions from Butane Before Control:</b>		<b>409.18</b>				

**Total Limited VOC Emissions from Butane After Control:** **165.26 tons/yr**

<sup>a</sup> Total gas allocation for curing is 18%, with 73% in curing area and 27% in outside storage  
 Tons per year VOC in each area = Butane Usage (tons/yr) x Gas Allocation Percentage (%)  
 Tons Per Year VOC Destroyed = Tons Per Year VOC in each area x Percent Capture Efficiency (%) x Percent Destruction Efficiency (%)  
 Tons Per Year VOC Emitted = Tons Per Year VOC in each area - Tons Per Year VOC Destroyed

**HAP Emissions:**

HAP	Emission Factor (lb/lb resin)	Emissions (tons/yr)
Styrene	2.59E-05	0.37
Ethyl Benzene	2.10E-06	0.03
<b>Total HAP Emissions</b>		<b>0.40 tons/yr</b>

**Methodology:**

HAP Emission factors from Americas Styrenics Study  
 HAP Emissions (tons/yr) = HAP Emission factor (lb/lb) x Resin Usage (tons/yr) x 2000 lbs/ton x 1/2000 lbs/ton  
 Note: Negligible VOC/HAP emissions from recycled polystyrene imported as cured foam sheet

**Total Limited VOC Emissions After Control:**  
 Total Emissions from Butane After Control: **165.26**  
 Total Emissions from HAPs that are also VOC: **0.40**  
**Total VOC: 165.65**

**PM Emissions:**

(Note - PM emission factors for material handling and transfer are not available. The closest operation Concrete Batching loading (Table 11.12-2) have EF Ratings of E). The uncontrolled PTEs are therefore calculated in reverse, based on filter control efficiencies)  
 Baghouse Control Efficiency: 99%  
 Baghouse Controlled Emissions = (2400 acfm) \* (0.026 gr/acf) \* (60 min/hr) \* (lb/7000 grains) \* (8,760 hrs/yr) \* (ton/2000 lbs) \* (9 baghouses) = **21.08 tons/hr**  
 Uncontrolled Emissions = (Controlled Emissions) / (1-0.99) = **2108.4 tons/hr**

**Appendix A: Emission Calculations**

**Natural Gas Combustion (RTO and Heaters)**

**Company Name:** Dolco Packaging  
**Address City IN Zip:** 2110 Patterson Street, Decatur, IN 46733  
**Permit Number:** 001-36352-00032  
**Reviewer:** Monica Dick

Heat Input Capacity MMBtu/hr	HHV MMBtu MMscf	Potential Throughput MMCF/yr
8.3	1020	71.0

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.07	0.27	0.27	0.02	3.55	0.20	2.98

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

**Methodology**

All emission factors are based on normal firing.  
 MMBtu = 1,000,000 Btu  
 MMCF = 1,000,000 Cubic Feet of Gas  
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03  
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Potential Emission in tons/yr	7.458E-05	4.261E-05	2.663E-03	6.392E-02	1.207E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Potential Emission in tons/yr	1.776E-05	3.906E-05	4.972E-05	1.349E-05	7.458E-05

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

<b>Total HAP</b>	<b>6.702E-02</b>
------------------	------------------

## Appendix A: Emission Calculations

### Printing Operations

**Company Name:** Dolco Packaging  
**Address City IN Zip:** 2110 Patterson Street, Decatur, IN 46733  
**Permit Number:** 001-36352-00032  
**Reviewer:** Monica Dick

#### Existing

##### Nine (9) Offset Printers

Note: It is assumed that all VOC from the ink is emitted as a worst case scenario.

Oil based Ink (lb/year) =	8,000	VOC content =	2.60%	UV Curable based (lb/year) =	30,000	VOC Content =	0.10%
Solvent usage (gal/yr) =	12,000	Solvent waste =	80%	Solvent emitted (gal/year)=	2,400	VOC content =	100%
						density (lb/gal) =	6.76
Oil based Ink VOC emissions (tons/yr) =		<b>0.10</b>					
UV Curable based (tons/yr) =		<b>0.02</b>					
Cleaning solvent (tons/yr) =		<b>8.11</b>					
Total VOC Emissions (tons/yr) =		<b>8.23</b>					

#### Methodology:

Ink VOC emissions (tons/year) = usage rate (lbs/yr) \* % VOC content \* ton/2000 lb

Solvent emitted (gal/year) = usage rate (gals/yr) \* (1 - solvent waste)

Solvent VOC emissions (ton/year) = Solvent emitted (gals/yr) \* % VOC content \* density (lb/gal) \* ton/2000 lb

#### Modified

##### Ten (10) Offset Printers

Oil based Ink (lb/yr) =	10,400	VOC content =	18.31%	Oil based emission factor =	5%
UV Curable based (lb) =	39,000	VOC Content =	0.01%		
Solvent usage (gal/yr) =	14,400	Solvent waste =	80%	Solvent emitted (gal/year)=	2,880
				VOC content =	100%
				density (lb/gal) =	6.76
Oil based Ink VOC emissions (tons/yr) =		<b>0.05</b>			
UV Curable based (tons/yr) =		<b>0.00</b>			
Cleaning solvent (tons/yr) =		<b>9.73</b>			
Total VOC Emissions (tons/yr) =		<b>9.78</b>			

#### Methodology:

Oil based Ink VOC emissions (tons/year) = usage rate (lbs/yr) \* % VOC content \* emission factor \* ton/2000 lb

UV curable Ink VOC emissions (tons/year) = usage rate (lbs/yr) \* % VOC content \* ton/2000 lb

Solvent VOC emissions (ton/year) = usage rate (gals/yr) \* % VOC content \* density (lb/gal) \* ton/2000 lb

#### Emission Factor:

EPA, Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, September 2006, EPA-453/R-06-002, Page 7.

#### Increase from the new printer and solvent usage

Modified: Total VOC Emissions (tons/yr) =	9.78
Existing: Total VOC Emissions (tons/yr) =	8.23
VOC increase (ton/yr) =	<b>1.55</b>

#### Methodology:

Modification Increase (ton/yr) = Modified total VOC emission (ton/yr) - Existing total VOC emission (ton/yr)

#### Modification Notes:

The existing emission factors were used for the solvent usage.

The UV Curable paste ink has a decreased VOC content of 0.01% as a worst case.

The coldset oil based ink has a higher VOC content. However, an EPA emission factor is applied resulting in decreased emission overall.



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

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

TO: Richard Schroeder  
Dolco Packaging  
2110 Patterson Street  
Decatur, IN 46733

DATE: November 4, 2015

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

SUBJECT: Final Decision  
Administrative Amendment  
001-36352-00032

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:  
Jim Baumgartner – Plant Manager  
Larry Bernson – Dewling Associates, Inc.  
Clark Baubles – Teckni-Plex, Inc.  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 8/27/2015

# Mail Code 61-53

IDEM Staff	GHOTOPP 11/4/2015 Dolco Packaging 001-36352-00032 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:  <b>CERTIFICATE OF MAILING ONLY</b>	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing 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		Richard Schroeder Dolco Packaging 2110 Patterson Street Decatur IN 46733 (Source CAATS) via certified mail										
2		Jim Baumgartner Plant Manager Dolco Packaging 2110 Patterson Street Decatur IN 46733 (RO CAATS)										
3		Adams County Commissioners 313 West Jefferson Street Decatur IN 46733 (Local Official)										
4		Adams County Health Department County Svcs Complex, 313 W. Jefferson # 314 Decatur IN 46733-1673 (Health Department)										
5		Mr. Phil Estridge 6651 S Greensboro Pike Knightstown IN 46148 (Affected Party)										
6		Decatur City Council and Mayors Office 225 W. Monroe St. Decatur IN 46733 (Local Official)										
7		Larry Bernson Dewling Associates, Inc. 1605 Vauxhall Road, Suite 315 Union NJ 07083 (Consultant)										
8		Clark Baubles Tekni-Plex, Inc. 460 E Swedesford Road, Suite 3000 Wayne PA 19087 (Source – addl contact)										
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 <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
7			