



# 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

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a  
Federally Enforceable State Operating Permit (FESOP)

for Willoughby Industries, Inc. in Marion County

FESOP Renewal No.: F097-36482-00676

The Indiana Department of Environmental Management (IDEM) has received an application from Willoughby Industries, Inc. located at 5105 W. 78th St., Indianapolis, Indiana 46268 for a renewal of its FESOP issued on August 24, 2011. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Willoughby Industries, Inc. to continue to operate its existing source.

This draft FESOP Renewal does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

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

Indianapolis Marion County Public Library- Pike Branch  
6525 Zionsville Road  
Indianapolis, IN 46268

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

### How can you participate in this process?

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

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number F097-36482-00676 in all correspondence.

**Comments should be sent to:**

Amal Agharkar  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 2-8422  
Or dial directly: (317) 232-8422  
Fax: (317) 232-6749 attn: Amal Agharkar  
E-mail: aagharka@idem.IN.gov

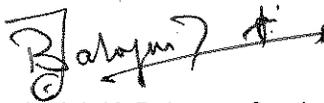
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**What will happen after IDEM makes a decision?**

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

If you have any questions, please contact Amal Agharkar of my staff at the above address.



Josiah K. Balogun, Section Chief  
Permits Branch  
Office of Air Quality



Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

DRAFT

# Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Willoughby Industries, Inc.  
5105 W. 78th St.  
Indianapolis, Indiana 46268**

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

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. 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 2-8 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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F097-36482-00676	
Issued by:  Josiah K. Balogun, Section Chief Permits Branch Office of Air Quality	Issuance Date:  Expiration Date:

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 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 2-8-3(b)]

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The Permittee owns and operates a stationary stationary cast polymer plumbing fixture manufacturing operation.

Source Address:	5105 W. 78th St., Indianapolis, Indiana 46268
General Source Phone Number:	317-638-2381
SIC Code:	3088 (Plastic Plumbing Fixtures) , 3444 (Sheet Metal Work), 3432 (Plumbing Fixture Fittings and Trim)
County Location:	Marion
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State 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 2-8-3(c)(3)]

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

- (a) One (1) Solid Surface Casting Operation, identified as Unit 01, consisting of both open molding and closed molding operations, injecting a maximum of 91.90 pounds per hour of resin, producing a maximum of 206.5 pounds of plumbing fixtures per hour, using a styrene collector and exhausting controls and exhausting outside, consisting of the following:
  - (1) Two (2) pot mixers used for mixing resin, filler and catalyst.
  - (2) One (1) pot washer using Marblewash to clean pot mixers.
  - (3) One (1) pot sink, using acetone to clean small parts.
  
- (b) One (1) Solid Surface Finishing Operation (performing machining and sanding operations), identified as unit 02, approved for construction in 2011, with a combined maximum capacity of 206.5 pounds of steel per hour, each sanding booth has four (4) cartridge dust collector units operated from a single control panel for particulate control, exhausting inside the building, and consisting of the following:
  - (1) Four (4) sanding booths, with a combined maximum capacity of 206.5 pounds per hour, each sanding booth.
  - (2) One (1) panel sander, with a maximum capacity of 206.5 pounds per hour, using a cartridge dust collector system, exhausting inside the building.
  - (3) Two (2) electric powered Post Cure Oven.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- (a) One (1) Plastic Injection Molding Operation, approved for construction in 2011, processing a maximum of 21.58 pounds of plumbing fixtures per hour, with no controls, exhausting inside the building, and consisting of the following:
  - (1) Three (3) injection Molding Machines.
  - (2) Three (3) Plastic Re grind Machines.
  - (3) One Chiller for injection molding.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 – Parts washer used in maintenance with a remote solvent reservoir. [326 IAC 8-3-2]
- (c) One (1) Metal Cutting Operation, identified MC, approved for construction in 2011, with a total capacity of and consisting of the following:
  - (1) Two (2) CO2 lasers with a maximum capacity of 114 pounds of steel per hour, using no control and exhausting inside the building.
  - (2) One (1) plasma cutter with a maximum capacity of five (5) pounds of steel per hour.
  - (3) Two (2) turret punch press.
  - (4) One (1) shear.
- (d) One (1) Metal Forming Operation, identified as forming, approved for construction in 2011, using no controls and exhausting inside the building, consisting of the following:
  - (1) Five (5) press breaks
  - (2) Two (2) power-rolling machines.
- (e) One (1) Metal Welding Operation, identified as MW, approved for construction in 2011, using no controls and exhausting inside the building, consisting of the following:
  - (1) Two (2) robot MIG welders with a maximum capacity of 1.73 pounds of rod per hour each.
  - (2) Thirty (30) welding stations consisting of:
    - (A) Sixteen (16) manual MIG welders, with a maximum capacity of 1.8 pounds of rod per hour, each.
    - (B) Forty (40) manual TIG welders, with a maximum capacity of 0.6 pounds of rod per hour, each.
  - (3) One (1) spot welder.
- (f) One (1) Metal Finishing Operation, identified as MF, approved for construction in 2011, consisting of the following:

- (1) Five (5) grinding booths, identified as booth 1 through 5, with a maximum combined capacity of 260 pounds of metal per hour, each, using cartridge dust collectors (four for each booth) for particulate control and exhausting inside the building.
  - (2) Two (2) Bead Blast Booths, using class beads media, with a maximum capacity of 50 pounds of metal per hour, each.
  - (3) Three (3) Bead Blast Cabinets, using class beads media, with a maximum capacity of 260 pounds of metal per hour, each, using filters for particulate control and exhausting inside the building
  - (4) One (1) Seat Polisher, with a maximum capacity of 260 pounds of steel per hour, using a wet collector for control, and exhausting inside the building.
- (g) One (1) Machine Shop Operation, identified as MS, approved for construction in 2011, using no controls and exhausting inside the building, and consisting of the following:
- (1) Six (6) lathes with a maximum capacity of 15 pounds of steel per hour, each.
  - (2) Five (5) mills with a maximum capacity of 15 pounds of steel per hour, each.
  - (3) One (1) horizontal saw
  - (4) Two (2) roto-polishers using a wet process and stain steel balls (large machine) or stone media (small machine).
  - (5) Two (2) burr benches (vibrating machines) using a wet process with stone media.
- (h) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour, including the following building heaters: [326 IAC 6.5-1-2(a)]
- (1) Three (3) Natural Gas-fired Furnaces, approved for construction in 2012, for comfort heating of the building's internal workspaces, with a maximum heat input capacity of 2.063 MMBtu/hr, each, uncontrolled and exhausting inside the building.
  - (2) One (1) Natural Gas-fired Furnace, approved for construction in 2012, for comfort heating of the building's internal workspaces, with a maximum heat input capacity of 0.350 MMBtu/hr, uncontrolled and exhausting inside the building.
  - (3) One (1) Natural Gas-fired Furnace, approved for construction in 2012, for comfort heating of the building's internal workspaces, with a maximum heat input capacity of 0.250 MMBtu/hr, uncontrolled and exhausting inside the building.
  - (4) One (1) Natural Gas-fired Furnace, approved for construction in 2012, for comfort heating of the building's internal workspaces, with a maximum heat input capacity of 0.240 MMBtu/hr, uncontrolled and exhausting inside the building.
  - (5) Two (2) Natural Gas-fired Furnaces, approved for construction in 2012, for comfort heating of the building's internal workspaces, with a maximum heat input capacity of 0.180 MMBtu/hr, each, uncontrolled and exhausting inside the building.
  - (6) Two (2) Natural Gas-fired Furnaces, approved for construction in 2012, for

- comfort heating of the building's internal workspaces, with a maximum heat input capacity of 0.115 MMBtu/hr, each, uncontrolled and exhausting inside the building.
- (7) Two (2) Natural Gas-fired Furnaces, approved for construction in 2012, for comfort heating of the building's internal workspaces, with a maximum heat input capacity of 0.060 MMBtu/hr, each, uncontrolled and exhausting inside the building.
  - (i) One (1) Tube Bending Operation, identified as TB, approved for construction in 2011, using no controls, exhausting inside the building and consisting of the following:
    - (1) Three (3) saws with a maximum capacity of 23 pounds of steel per hour, each.
    - (2) Three (3) large (2-3 inch diameter) tube benders with a maximum capacity of 23 pounds of steel per hour, each.
    - (3) One (1) mill with a maximum capacity of 23 pounds of steel per hour.
  - (j) One Draw Press Operation, identified as DP, approved for construction in 2011 and consisting of a combination of punch and draw presses.
  - (k) One (1) Electronic Assembly Operation, identified as EA, approved for construction in 2011, cabling, final assembly, and testing.
  - (l) One (1) Valve Assembly Operation, identified as VA, approved for construction in 2011, valve testing and final assembly.
  - (m) One (1) Tool Room consisting of various, drills, saws, lathes, mills, and surface grinders.
  - (n) Compressor Room E consisting of three (3) air compressors and one (1) air dryer.
  - (o) Compressor Room W consisting of two (2) air compressors and one (1) air dryer.
  - (p) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
  - (q) Paved and unpaved roads and parking lots with public access.
  - (r) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
  - (s) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
  - (t) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
  - (u) Finished Parts Packaging operations, consisting of:
    - (1) Two (2) Instapak foam packaging spray station with self-contained dispensing, for finished parts packaging, using less than five (5) pounds of foam component material per hour;
    - (2) Cleaners and solvents characterized as having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth

(0.1) pound per square inch) measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit), the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months. [326 IAC 2-7-1(21)(G)(i)(AA)(aa)]

- (v) Non-production related woodworking operations, consisting of three (3) circular-bladed saws, for the as-needed modification of packaging materials used to ship final product, with potential uncontrolled emissions of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM10) of less than twenty-five (25) pounds per day [326 IAC 2-7-1(21)(B)]. [326 IAC 6.5-1-2(a)]

A.4 FESOP Applicability [326 IAC 2-8-2]

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-8-1]

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

### B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

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- (a) This permit, F097-36482-00676, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

### B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

### B.5 Severability [326 IAC 2-8-4(4)]

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

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

### B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

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- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

- (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), 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) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 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

- (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 2-8-4(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.12 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or 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 2-8-4(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) 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.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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

- (a) All terms and conditions of permits established prior to F097-36482-00676 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
- (2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

**B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State 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 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-8(a)]
- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

**B.16 Permit Renewal [326 IAC 2-8-3(h)]**

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- (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 2-8-3. 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(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least 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 2-8 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 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (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 approval required by 326 IAC 2-8-11.1 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 2-8-15(b)(1) and (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 2-8-15(b)(1) and (c).

- (b) **Emission Trades [326 IAC 2-8-15(b)]**  
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 2-8-15(b).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(c)]**  
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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) 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.19 Source Modification Requirement [326 IAC 2-8-11.1]**

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

**B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than 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) 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.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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 2-8-4(1)]**

**C.1 Overall Source Limit [326 IAC 2-8]**

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

**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 thirty percent (30%) 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]

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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]

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

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

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- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.

### **Testing Requirements [326 IAC 2-8-4(3)]**

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

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- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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

### **Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]**

#### **C.9 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. 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 2-8-4][326 IAC 2-8-5(a)(1)]**

**C.11 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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

**C.12 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

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

**C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**C.14 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. 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 FESOP.
- 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.15 General Reporting Requirements [326 IAC 2-8-4(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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) 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.16 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) Solid Surface Casting Operation, identified as Unit 01, consisting of both open molding and closed molding operations, injecting a maximum of 91.90 pounds per hour of resin, producing a maximum of 206.5 pounds of plumbing fixtures per hour, using a styrene collector and exhausting controls and exhausting outside, consisting of the following:
- (1) Two (2) pot mixers used for mixing resin, filler and catalyst.
  - (2) One (1) pot washer using Marblewash to clean pot mixers.
  - (3) One (1) pot sink, using acetone to clean small parts.
- (b) One (1) Solid Surface Finishing Operation (performing machining and sanding operations), identified as unit 02, approved for construction in 2011, with a combined maximum capacity of 206.5 pounds of steel per hour, each sanding booth has four (4) cartridge dust collector units operated from a single control panel for particulate control, exhausting inside the building, and consisting of the following:
- (1) Four (4) sanding booths, with a combined maximum capacity of 206.5 pounds per hour, each sanding booth.
  - (2) One (1) panel sander, with a maximum capacity of 206.5 pounds per hour, using a cartridge dust collector system, exhausting inside the building.
  - (3) Two (2) electric powered Post Cure Oven.

(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 2-8-4(1)]

#### D.1.1 FESOP Limits [326 IAC 2-8-4] [326 IAC 2-4.1]

- (a) Styrene (single HAP)  
The use of resin in the resin mixing and casting operation (Unit 01) shall be limited such that the potential to emit (PTE) of styrene shall be limited such that the combined potential to emit (PTE) of any single HAP shall not exceed 9.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) Methyl Methacrylate (MMA) (single HAP)  
The use of resin in the resin mixing and casting operation (Unit 01) shall be limited such that the potential to emit (PTE) of methyl methacrylate (MMA) shall be limited such that the combined potential to emit (PTE) of any single HAP shall not exceed 9.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) Total HAPs  
The use of resin in the resin mixing and casting operation (Unit 01) shall be limited such that the potential to emit (PTE) of the combination of HAPs in Unit 01 shall be limited such that the total HAPs shall not exceed 19.57 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of each single HAP to less than ten (10) tons per year, and total HAPs to less than twenty-five (25) tons per year and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable and make this source an area source of HAPs.

**D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]**

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In order to render 326 IAC 8-1-6 not applicable, the use of resins and solvents in the resin mixing and casting operation (Unit 01) shall be limited such that the potential to emit (PTE) of VOC shall not exceed 24.84 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit will limit the VOC emissions from the resin mixing and casting operation, identified as Unit 01 and render 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable to Unit 01.

Note: This VOC limit is for the VOC emissions from the resin, catalyst, mold release, pigments and pot cleaner.

**D.1.3 Particulate Matter (PM) [326 IAC 6.5-1-2]**

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Pursuant to 326 IAC 6.5-1-2, the emission units Unit 01 and Unit 02 shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).

**D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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A Preventive Maintenance Plan is required for Unit 01 and Unit 02 and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

**Compliance Determination Requirements [326 IAC 2-8-4(1)]**

**D.1.5 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-8-4(1)]**

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To demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall keep the monthly Air Quality Compliance Data Log and will use the following formulas for calculating monthly emissions from the resin mixing and casting operation (Unit 01), utilizing the "Unified Emission Factors for Open Molding of Composites" (Composites Fabricators Association (CFA), July 23, 2001) or its updates:

- (a) Styrene emission from resins:  
 $E_S = ((F_1 * S) - C) * R * (1 \text{ ton}/2,000 \text{ pounds resin})$ , where:  
 $E_S$  = Styrene emission from resins in tons per month  
 $F_1$  = Emission Factor of 0.157 in pound per pound of resin used  
(from CFA emission factor source noted above for "mechanical non-atomized" resin use)  
 $S$  = Percent of styrene in resin  
(obtained from applicable MSDS sheet or manufacturer's specification sheet)  
 $C$  = Constant of 0.0165  
(from CFA emission factor source noted above for "mechanical non-atomized" resin use)  
 $R$  = Total amount of resin in pounds per month
- (b) Methyl Methacrylate (MMA) emissions from resins:  
 $E_M = (F_2 * M) * R * (1 \text{ ton}/2,000 \text{ pounds resin})$ , where:  
 $E_M$  = Methyl methacrylate (MMA) emission in tons per month  
 $F_2$  = Emission factor of 0.75 pound emitted per pound of resin used

(from CFA emission factor source noted above for MMA emissions)  
M = Percent of MMA in resin  
(obtained from applicable MSDS sheet or manufacturer's specification sheet)  
R = Total amount of resin in pounds per month

(c) VOC from catalyst:

$E_V = F_3 * V * K$  (1 ton/2,000 pounds), where:  
 $E_V$  = VOC emissions in tons per month  
 $F_3$  = Emission factor of 0.02  
(based on information from the catalyst supplier, only 2% of VOCs are emitted,  
with the remainder being consumed in the reaction)  
V = Percent of VOC content  
(obtained from applicable MSDS sheet or manufacturer's specification sheet)  
K = Total amount of catalyst in pounds per month

(d) VOC from pigment:

$E_P = F_4 * V * P$  (1 ton/2,000 pounds), where:  
 $E_P$  = VOC emissions in tons per month  
 $F_4$  = Emission factor of 1.0  
(in absence of other data, it is assumed that all VOC is emitted)  
V = Percent of VOC content (obtained from applicable MSDS sheet or  
manufacturer's specification sheet)  
P = Total amount of pigment in pounds per month

(e) VOC from mold release chemical:

$E_R = F_5 * V * R$  (1 ton/2,000 pounds), where:  
 $E_R$  = VOC emission in tons per month  
 $F_5$  = Emission factor of 1.0  
(in absence of other data, it is assumed that all VOC is emitted)  
V = Percent of VOC content  
(obtained from applicable MSDS sheet or manufacturer's specification sheet)  
R = Total amount of mold release in pounds per month

(f) VOC from pot-washer chemical

$E_W = F_6 * V * W$  (1 ton/2,000 pounds), where:  
 $E_W$  = VOC emissions in tons per month  
 $F_6$  = Emission factor of 0.25  
(based on information from the chemical supplier, only 25% of the VOCs are  
emitted)  
V = Percent of VOC content  
(obtained from applicable MSDS sheet or manufacturer's specification sheet)  
W = Total amount of pot-washer chemical in pounds per month.

(g) Combination of HAP emissions in tons =  $E_S + E_M$

(h) Total VOC emissions in tons =  $E_S + E_M + E_V + E_P + E_R + E_W$

D.1.6 Particulate Control[326 IAC 2-8-4(1)]

In order to comply with Condition D.1.3, the cartridge dust collector for particulate control shall be in operation and control emissions from the Unit 02 at all times Unit 02 is in operation.

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

### **D.1.7 Record Keeping Requirement [326 IAC 2 8 4(3)]**

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- (a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records, including monthly VOC and HAP emission calculations, in a monthly "Air Quality Compliance Log" in accordance with (1) through (6) below. These records shall be taken monthly and shall be complete and sufficient to demonstrate compliance with the VOC and/or HAP emission limits established in Conditions D.1.1 and D.1.2. These records shall be available within 30 days of the end of each compliance period and shall contain, but not be limited to, the following information:
- (1) The VOC and HAP content of each resin and solvent used.
  - (2) The amount of resin and solvent less water used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC, single HAP, and combined HAP usage for each month; and
  - (5) Amount of VOC and HAPs emitted for each compliance period.
  - (6) Monthly inventory records necessary to verify the type and amount used.
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

### **D.1.8 Reporting Requirements [326 IAC 2 8 4(3)]**

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A quarterly summary of the information to document compliance status with Conditions D.1.1 and D.1.2 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligations with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description [326 IAC 2-8-4(10)]: Insignificant Activities**

- (a) One (1) Plastic Injection Molding Operation, approved for construction in 2011, processing a maximum of 21.58 pounds of plumbing fixtures per hour, with no controls, exhausting inside the building, and consisting of the following:
  - (1) Three (3) injection Molding Machines.
  - (2) Three (3) Plastic Regrind Machines.
  - (3) One Chiller for injection molding.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 – Parts washer used in maintenance with a remote solvent reservoir. [326 IAC 8-3-2]
- (c) One (1) Metal Cutting Operation, identified MC, approved for construction in 2011, with a total capacity of and consisting of the following:
  - (1) Two (2) CO2 lasers with a maximum capacity of 114 pounds of steel per hour, using no control and exhausting inside the building.
  - (2) One (1) plasma cutter with a maximum capacity of five (5) pounds of steel per hour.
  - (3) Two (2) turret punch press.
  - (4) One (1) shear.
- (d) One (1) Metal Forming Operation, identified as forming, approved for construction in 2011, using no controls and exhausting inside the building, consisting of the following:
  - (1) Five (5) press breaks
  - (2) Two (2) power-rolling machines.
- (e) One (1) Metal Welding Operation, identified as MW, approved for construction in 2011, using no controls and exhausting inside the building, consisting of the following:
  - (1) Two (2) robot MIG welders with a maximum capacity of 1.73 pounds of rod per hour each.
  - (2) Thirty (30) welding stations consisting of:
    - (A) Sixteen (16) manual MIG welders, with a maximum capacity of 1.8 pounds of rod per hour, each.
    - (B) Forty (40) manual TIG welders, with a maximum capacity of 0.6 pounds of rod per hour, each.
  - (3) One (1) spot welder.
- (f) One (1) Metal Finishing Operation, identified as MF, approved for construction in 2011, consisting of the following:

- (1) Five (5) grinding booths, identified as booth 1 through 5, with a maximum combined capacity of 260 pounds of metal per hour, each, using cartridge dust collectors (four for each booth) for particulate control and exhausting inside the building.
  - (2) Two (2) Bead Blast Booths, using class beads media, with a maximum capacity of 50 pounds of metal per hour, each.
  - (3) Three (3) Bead Blast Cabinets, using class beads media, with a maximum capacity of 260 pounds of metal per hour, each, using filters for particulate control and exhausting inside the building
  - (4) One (1) Seat Polisher, with a maximum capacity of 260 pounds of steel per hour, using a wet collector for control, and exhausting inside the building.
- (g) One (1) Machine Shop Operation, identified as MS, approved for construction in 2011, using no controls and exhausting inside the building, and consisting of the following:
- (1) Six (6) lathes with a maximum capacity of 15 pounds of steel per hour, each.
  - (2) Five (5) mills with a maximum capacity of 15 pounds of steel per hour, each.
  - (3) One (1) horizontal saw
  - (4) Two (2) roto-polishers using a wet process and stain steel balls (large machine) or stone media (small machine).
  - (5) Two (2) burr benches (vibrating machines) using a wet process with stone media.
- (h) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour, including the following building heaters: [326 IAC 6.5-1-2(a)]
- (1) Three (3) Natural Gas-fired Furnaces, approved for construction in 2012, for comfort heating of the building's internal workspaces, with a maximum heat input capacity of 2.063 MMBtu/hr, each, uncontrolled and exhausting inside the building.
  - (2) One (1) Natural Gas-fired Furnace, approved for construction in 2012, for comfort heating of the building's internal workspaces, with a maximum heat input capacity of 0.350 MMBtu/hr, uncontrolled and exhausting inside the building.
  - (3) One (1) Natural Gas-fired Furnace, approved for construction in 2012, for comfort heating of the building's internal workspaces, with a maximum heat input capacity of 0.250 MMBtu/hr, uncontrolled and exhausting inside the building.
  - (4) One (1) Natural Gas-fired Furnace, approved for construction in 2012, for comfort heating of the building's internal workspaces, with a maximum heat input capacity of 0.240 MMBtu/hr, uncontrolled and exhausting inside the building.
  - (5) Two (2) Natural Gas-fired Furnaces, approved for construction in 2012, for comfort heating of the building's internal workspaces, with a maximum heat input capacity of 0.180 MMBtu/hr, each, uncontrolled and exhausting inside the building.
  - (6) Two (2) Natural Gas-fired Furnaces, approved for construction in 2012, for comfort heating of the building's internal workspaces, with a maximum heat input capacity of 0.115 MMBtu/hr, each, uncontrolled and exhausting inside the building.

- (7) Two (2) Natural Gas-fired Furnaces, approved for construction in 2012, for comfort heating of the building's internal workspaces, with a maximum heat input capacity of 0.060 MMBtu/hr, each, uncontrolled and exhausting inside the building.
- (i) One (1) Tube Bending Operation, identified as TB, approved for construction in 2011, using no controls, exhausting inside the building and consisting of the following:
  - (1) Three (3) saws with a maximum capacity of 23 pounds of steel per hour, each.
  - (2) Three (3) large (2-3 inch diameter) tube benders with a maximum capacity of 23 pounds of steel per hour, each.
  - (3) One (1) mill with a maximum capacity of 23 pounds of steel per hour.
- (j) One Draw Press Operation, identified as DP, approved for construction in 2011 and consisting of a combination of punch and draw presses.
- (k) One (1) Electronic Assembly Operation, identified as EA, approved for construction in 2011, cabling, final assembly, and testing.
- (l) One (1) Valve Assembly Operation, identified as VA, approved for construction in 2011, valve testing and final assembly.
- (m) One (1) Tool Room consisting of various, drills, saws, lathes, mills, and surface grinders.
- (n) Compressor Room E consisting of three (3) air compressors and one (1) air dryer.
- (o) Compressor Room W consisting of two (2) air compressors and one (1) air dryer.
- (p) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (q) Paved and unpaved roads and parking lots with public access.
- (r) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (s) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (t) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (u) Finished Parts Packaging operations, consisting of:
  - (1) Two (2) Instapak foam packaging spray station with self-contained dispensing, for finished parts packaging, using less than five (5) pounds of foam component material per hour;
  - (2) Cleaners and solvents characterized as having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit), the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months. [326 IAC 2-7-

1(21)(G)(i)(AA)(aa)]

- (v) Non-production related woodworking operations, consisting of three (3) circular-bladed saws, for the as-needed modification of packaging materials used to ship final product, with potential uncontrolled emissions of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM10) of less than twenty-five (25) pounds per day [326 IAC 2-7-1(21)(B)]. [326 IAC 6.5-1-2(a)]

(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 2-8-4(1)]**

#### **D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]**

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Operations), for cold cleaning and degreasing operations constructed after January 1, 1980, the Permittee shall:

- (a) Ensure the following control equipment and operating requirements are met:
- (1) Equip the cleaner with a cover;
  - (2) Equip the cleaner with a facility for draining cleaned parts;
  - (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
  - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
  - (5) Provide a permanent, conspicuous label summarizing the operation requirements;
  - (6) Store waste solvent only in covered containers.
  - (7) Prohibit the disposal or transfer of waste solvent, in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
- (b) Ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent used is insoluble in, and heavier than, water.
    - (C) A refrigerated chiller.
    - (D) Carbon adsorption.
    - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
  - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

- (3) If used, solvent spray:
  - (A) must be a solid, fluid stream; and
  - (B) shall be applied at a pressure that does not cause excessive splashing.

**D.2.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]**

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Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit.

**D.2.3 Particulate Matter [326 IAC 6.5-1-2]**

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Pursuant to 326 IAC 6.5-1-2, the Metal Cutting Operation (MC) and Metal Welding Operation (MW) shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**D.2.4 Record Keeping Requirements [326 IAC 2 8 4(3)]**

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To document the compliance status with Condition D.2.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

- (1) The name and address of the solvent supplier.
- (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
- (3) The type of solvent purchased.
- (4) The total volume of the solvent purchased.
- (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Willoughby Industries, Inc.  
Source Address: 5105 W. 78th St., Indianapolis, Indiana 46268  
FESOP Permit No.: F097-36482-00676

**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:

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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Willoughby Industries, Inc.  
Source Address: 5105 W. 78th St., Indianapolis, Indiana 46268  
FESOP Permit No.: F097-36482-00676

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• 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 2-8-12</li></ul> |
|--|

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 Describe:
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**

**FESOP Quarterly Report**

Source Name: Willoughby Industries, Inc.  
Source Address: 5105 W. 78th St., Indianapolis, Indiana 46268  
FESOP Permit No.: F097-36482-00676  
Facility: resin mixing and casting operation  
Parameter: resin and solvent usage to limit VOC emissions  
Limit: The use of resins and solvents in the resin mixing and casting operation (Unit 01) shall be limited such that the potential to emit (PTE) of VOC shall be limited to 24.84 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**

**FESOP Quarterly Report**

Source Name: Willoughby Industries, Inc.  
 Source Address: 5105 W. 78th St., Indianapolis, Indiana 46268  
 FESOP Permit No.: F097-30378-00676  
 Facility: resin mixing and casting operation (Unit 01)  
 Parameter: resin and solvent usage to limit HAP emissions  
 Limit: (a) The use of resin in the resin mixing and casting operation (Unit 01) shall be limited such that the potential to emit (PTE) of styrene and methyl methacrylate (MMA) shall each be limited to 9.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.  
 (b) The use of resin in the resin mixing and casting operation (Unit 01) shall be limited such that the potential to emit (PTE) of the combination of HAPs shall be limited to 19.57 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Total HAPs (tons)			Total HAPs (tons)			Total HAPs (tons)			All HAPs (tons)
	This Month			Previous 11 Months			12 Month Total			
	Styrene	MMA	Other	Styrene	MMA	Other	Styrene	MMA	Other	

No deviation occurred in this quarter.  
 Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Willoughby Industries, Inc.  
Source Address: 5105 W. 78th St., Indianapolis, Indiana 46268  
FESOP Permit No.: F097-36482-00676

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

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. 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>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<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</b> (specify permit condition #)	
<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</b> (specify permit condition #)	
<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</b> (specify permit condition #)	
<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</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

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

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

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

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

Technical Support Document (TSD) for a  
Federally Enforceable State Operating Permit Renewal

<b>Source Background and Description</b>
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<b>Source Name:</b>	<b>Willoughby Industries, Inc.</b>
<b>Source Location:</b>	<b>5105 W. 78th St.</b>
<b>County:</b>	<b>Marion (Pike Township)</b>
<b>SIC Code:</b>	<b>3088 (Plastic Plumbing Fixtures) , 3444 (Sheet Metal Work), 3432 (Plumbing Fixture Fittings and Trim)</b>
<b>Permit Renewal No.:</b>	<b>F097-36482-00676</b>
<b>Permit Reviewer:</b>	<b>Amal Agharkar</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Willoughby Industries, Inc. relating to the operation of a stationary cast polymer resin and fabrication of metalplumbing fixture manufacturing operation. On November 13, 2015, Willoughby Industries, Inc. submitted an application to the OAQ requesting to renew its operating permit. Willoughby Industries, Inc was issued its first FESOP No. F097-30378-00676 on August 24, 2011.

<b>Permitted Emission Units and Pollution Control Equipment</b>
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The source consists of the following permitted emission units:

- (a) One (1) Solid Surface Casting Operation, identified as Unit 01, consisting of both open molding and closed molding operations with a maximum casting capacity of 91.90 pounds per hour of resin, producing a maximum of 206.5 pounds of plumbing fixtures per hour, using a styrene collector and exhausting controls and exhausting outside, consisting of the following:
  - (1) Two (2) pot mixers used for mixing resin, filler and catalyst.
  - (2) One (1) pot washer using Marblewash to clean pot mixers.
  - (3) One (1) pot sink, using acetone to clean small parts.
  
- (b) One (1) Solid Surface Finishing Operation (performing machining and sanding operations), identified as unit 02, approved for construction in 2011, with a combined maximum capacity of 206.5 pounds of steel per hour, each sanding booth has four (4) cartridge dust collector units operated from a single control panel for particulate control, exhausting inside the building, and consisting of the following:
  - (1) Four (4) sanding booths, with a combined maximum capacity of 206.5 pounds per hour, each sanding booth.
  - (2) One (1) panel sander, with a maximum capacity of 206.5 pounds per hour, using a cartridge dust collector system, exhausting inside the building.
  - (3) Two (2) electric powered Post Cure Oven.

<b>Insignificant Activities</b>
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This stationary source also includes the following insignificant activities:

- (a) One (1) Plastic Injection Molding Operation, approved for construction in 2011, processing a maximum of 21.58 pounds of plumbing fixtures per hour, with no controls, exhausting inside the building, and consisting of the following:
  - (1) Three (3) injection Molding Machines.
  - (2) Three (3) Plastic Re grind Machines.
  - (3) One Chiller for injection molding.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 – Parts washer used in maintenance with a remote solvent reservoir. [326 IAC 8-3-2]
- (c) One (1) Metal Cutting Operation, identified MC, approved for construction in 2011, with a total capacity of and consisting of the following:
  - (1) Two (2) CO2 lasers with a maximum capacity of 114 pounds of steel per hour, using no control and exhausting inside the building.
  - (2) One (1) plasma cutter with a maximum capacity of five (5) pounds of steel per hour.
  - (3) Two (2) turret punch press.
  - (4) One (1) shear.
- (d) One (1) Metal Forming Operation, identified as forming, approved for construction in 2011, using no controls and exhausting inside the building, consisting of the following:
  - (1) Five (5) press breaks
  - (2) Two (2) power-rolling machines.
- (e) One (1) Metal Welding Operation, identified as MW, approved for construction in 2011, using no controls and exhausting inside the building, consisting of the following:
  - (1) Two (2) robot MIG welders with a maximum capacity of 1.73 pounds of rod per hour each.
  - (2) Thirty (30) welding stations consisting of:
    - (A) Sixteen (16) manual MIG welders, with a maximum capacity of 1.8 pounds of rod per hour, each.
    - (B) Forty (40) manual TIG welders, with a maximum capacity of 0.6 pounds of rod per hour, each.
  - (3) One (1) spot welder.

- (f) One (1) Metal Finishing Operation, identified as MF, approved for construction in 2011, consisting of the following:
  - (1) Five (5) grinding booths, identified as booth 1 through 5, with a maximum combined capacity of 260 pounds of metal per hour, each, using cartridge dust collectors (four for each booth) for particulate control and exhausting inside the building.
  - (2) Two (2) Bead Blast Booths, using class beads media, with a maximum capacity of 50 pounds of metal per hour, each.
  - (3) Three (3) Bead Blast Cabinets, using class beads media, with a maximum capacity of 260 pounds of metal per hour, each, using filters for particulate control and exhausting inside the building
  - (4) One (1) Seat Polisher, with a maximum capacity of 260 pounds of steel per hour, using a wet collector for control, and exhausting inside the building.
  
- (g) One (1) Machine Shop Operation, identified as MS, approved for construction in 2011, using no controls and exhausting inside the building, and consisting of the following:
  - (1) Six (6) lathes with a maximum capacity of 15 pounds of steel per hour, each.
  - (2) Five (5) mills with a maximum capacity of 15 pounds of steel per hour, each.
  - (3) One (1) horizontal saw
  - (4) Two (2) roto-polishers using a wet process and stain steel balls (large machine) or stone media (small machine).
  - (5) Two (2) burr benches (vibrating machines) using a wet process with stone media.
  
- (h) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units (MMBtu) per hour, including the following building heaters: [326 IAC 6.5-1-2(a)]
  - (1) Three (3) Natural Gas-fired Furnaces, approved for construction in 2012, for comfort heating of the building's internal workspaces, with a maximum heat input capacity of 2.063 MMBtu/hr, each, uncontrolled and exhausting inside the building.
  - (2) One (1) Natural Gas-fired Furnace, approved for construction in 2012, for comfort heating of the building's internal workspaces, with a maximum heat input capacity of 0.350 MMBtu/hr, uncontrolled and exhausting inside the building.
  - (3) One (1) Natural Gas-fired Furnace, approved for construction in 2012, for comfort heating of the building's internal workspaces, with a maximum heat input capacity of 0.250 MMBtu/hr, uncontrolled and exhausting inside the building.
  - (4) One (1) Natural Gas-fired Furnace, approved for construction in 2012, for comfort heating of the building's internal workspaces, with a maximum heat input capacity of 0.240 MMBtu/hr, uncontrolled and exhausting inside the building.
  - (5) Two (2) Natural Gas-fired Furnaces, approved for construction in 2012, for comfort heating of the building's internal workspaces, with a maximum heat input

- capacity of 0.180 MMBtu/hr, each, uncontrolled and exhausting inside the building.
- (6) Two (2) Natural Gas-fired Furnaces, approved for construction in 2012, for comfort heating of the building's internal workspaces, with a maximum heat input capacity of 0.115 MMBtu/hr, each, uncontrolled and exhausting inside the building.
  - (7) Two (2) Natural Gas-fired Furnaces, approved for construction in 2012, for comfort heating of the building's internal workspaces, with a maximum heat input capacity of 0.060 MMBtu/hr, each, uncontrolled and exhausting inside the building.
  - (i) One (1) Tube Bending Operation, identified as TB, approved for construction in 2011, using no controls, exhausting inside the building and consisting of the following:
    - (1) Three (3) saws with a maximum capacity of 23 pounds of steel per hour, each.
    - (2) Three (3) large (2-3 inch diameter) tube benders with a maximum capacity of 23 pounds of steel per hour, each.
    - (3) One (1) mill with a maximum capacity of 23 pounds of steel per hour.
  - (j) One Draw Press Operation, identified as DP, approved for construction in 2011 and consisting of a combination of punch and draw presses.
  - (k) One (1) Electronic Assembly Operation, identified as EA, approved for construction in 2011, cabling, final assembly, and testing.
  - (l) One (1) Valve Assembly Operation, identified as VA, approved for construction in 2011, valve testing and final assembly.
  - (m) One (1) Tool Room consisting of various, drills, saws, lathes, mills, and surface grinders.
  - (n) Compressor Room E consisting of three (3) air compressors and one (1) air dryer.
  - (o) Compressor Room W consisting of two (2) air compressors and one (1) air dryer.
  - (p) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
  - (q) Paved and unpaved roads and parking lots with public access.
  - (r) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
  - (s) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
  - (t) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
  - (u) Finished Parts Packaging operations, consisting of:

- (1) Two (2) Instapak foam packaging spray station with self-contained dispensing, for finished parts packaging, using less than five (5) pounds of foam component material per hour;
- (2) Cleaners and solvents characterized as having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit), the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months. [326 IAC 2-7-1(21)(G)(i)(AA)(aa)]
- (v) Non-production related woodworking operations, consisting of three (3) circular-bladed saws, for the as-needed modification of packaging materials used to ship final product, with potential uncontrolled emissions of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM10) of less than twenty-five (25) pounds per day [326 IAC 2-7-1(21)(B)]. [326 IAC 6.5-1-2(a)]

**Existing Approvals**

Since the issuance of the FESOP No. 097-30378-00676 on August 24, 2011, the source has constructed or has been operating under the following additional approvals:

- (a) Administrative Amendment No. 097-31492-00676 issued on March 19, 2012.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

**Enforcement Issue**

There are no enforcement actions pending.

**Emission Calculations**

See Appendix A of this document for detailed emission calculations.

**County Attainment Status**

The source is located in Marion County.

Pollutant	Designation
SO <sub>2</sub>	Non-attainment effective October 4, 2013, for the 2010 SO <sub>2</sub> standard for the Center Township, Perry Township, and Wayne Township. Better than national standards for the remainder of the county.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 <sup>th</sup> Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
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>	Attainment effective July 11, 2013, 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.

Pollutant	Designation
	<sup>1</sup> Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation 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. Marion 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>**  
 Marion 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**  
 Marion County, Pike Township has been classified as attainment or unclassifiable in Indiana for CO, PM<sub>10</sub>, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Note: West 78th Street, where the source is located is not in Center Township, Perry Township, and Wayne Township. These townships are nonattainment for SO<sub>2</sub>.

**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.

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	35.00
PM <sub>10</sub>	35.19
PM <sub>2.5</sub>	35.19
SO <sub>2</sub>	0.02
NO <sub>x</sub>	3.39
VOC	37.30
CO	2.85
Single HAP	15.48
Total HAP	35.97

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

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.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all criteria pollutants are less than 100 tons per year.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the Permittee has agreed to limit the source's single HAP emissions and total HAP emissions below Title V levels. Therefore, the Permittee will be issued a FESOP Renewal.

**Actual Emissions**

No previous emission data has been received from the source.

**Potential to Emit After Issuance**

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub> **	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Resin Mixing and Casting Operations (Unit 01)	--	--	--	--	--	24.87	--	19.57	9.9 (Styrene)
Solid Surface Finishing Operation (SF)	21.90	21.90	21.90	--	--	--	--	--	--
Closed Injection Molding Operations/three scrap regrinder machines	0.53	0.53	0.53	--	--	0.01	--	1.27 E-04	--
Welding Operation	1.19	1.19	1.19	--	--	--	--	0.10	0.06
Laser Cutting	6.61	6.61	6.61	--	--	--	--	--	--

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub> **	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Insignificant Activities									
Packaging Operations	--	--	--	--	--	5.22	--	5.22	5.22 (MDI)
Natural Gas Combustion	0.06	0.26	0.26	0.02	3.39	0.19	2.85	0.06	0.06
Woodworking	4.56	4.56	4.56	--	--	--	--	--	--
<b>Total PTE of Entire Source</b>	<b>35.00</b>	<b>35.19</b>	<b>35.19</b>	<b>0.02</b>	<b>3.39</b>	<b>30.28</b>	<b>2.85</b>	<b>24.95</b>	<b>&lt;10</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". **PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> .									

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

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

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant 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).

### **Federal Rule Applicability**

#### Compliance Assurance Monitoring (CAM)

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

#### New Source Performance Standards (NSPS)

- (b) 40 CFR 60, Subpart Kb - New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels)

The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) For Which Construction, Reconstruction, Or Modification Commenced After July 23, 1984, 40 CFR 60.110b, Subpart Kb (326 IAC 12), are not included in the permit for the insignificant VOC storage tanks with capacity less than or equal to 1,000 gallons because each tank storage capacity is less than 75 cubic meters.

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

#### National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (d) 40 CFR 63, Subpart MMMM - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products

The source which also manufactures plumbing fixtures made of metal is not subject to 40 CFR 63, Subpart MMMM (326IAC 20-86) because no surface coating operation is made to the metal fixtures.

- (e) 40 CFR Part 63, Subpart PPPP - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products

The source which also manufactures plumbing fixtures made of plastic is not subject to 40 CFR 63, Subpart PPPP because no surface coating operation is made to the plastic fixtures.

- (f) 40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production

This rule applies to reinforced plastic composites production facility located at a major source of HAP emissions. The requirements of the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production, 40 CFR 63.5785, Subpart WWWW (4W) (326 IAC 20-56) are not included in this permit because this source is an area source of Hazardous Air Pollutants (HAPs).

- (g) 40 CFR 63.11169, Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

This rule applies to the following:

- (1) Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), Chemical Abstract Service number 75092, in paint removal processes;
- (2) Autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations;
- (3) Spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

The rule is not applicable to the Solid Surface Finishing Operation because it does not apply coating to the metal and plastic fixtures that it manufactures.

- (h) 40 CFR 63, Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

This rule applies to area sources that are primarily engaged in the operations in one of the following nine source categories listed in this section.

- (1) Electrical and Electronic Equipment Finishing Operations;
- (2) Fabricated Metal Products;
- (3) Fabricated Plate Work (Boiler Shops);
- (4) Fabricated Structural Metal Manufacturing;
- (5) Heating Equipment, except Electric;
- (6) Industrial Machinery and Equipment Finishing Operations;
- (7) Iron and Steel Forging;
- (8) Primary Metal Products Manufacturing; and
- (9) Valves and Pipe Fittings.

The Welding Operation is not subject to this rule because the metal fabrication and valves and fittings manufacturing being performed at the source do not meet source categories listed in Table 1 of this NESHAP, Subpart XXXXXX.

- (i) 40 CFR 63, Subpart T - National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning

The degreasing operation listed as an insignificant activity is not subject to 40 CFR 603, Subpart T because it does not use any halogenated solvents listed in this rule.

- (j) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

<b>State Rule Applicability - Entire Source</b>
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**326 IAC 2-2 (Prevention of Significant Deterioration)**

The uncontrolled potential to emit of all regulated pollutants are less than 250 tons per year, and it is not one of the twenty-eight (28) listed source categories. Therefore, the source is not subject to the requirements of 326 IAC 2-2 (PSD).

**326 IAC 2-8-4 (FESOP)**

The uncontrolled single HAP and total HAPs emissions are more than 10 tons per year and 25 tons per year respectively for this source. Pursuant to this rule the potential to emit single HAPs shall be limited to less than ten (10) tons per year and total HAPs to less than twenty-five (25) tons per year,

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following

- (1) **Styrene (Single HAP)**  
The use of resin in the resin mixing and casting operation (Unit 01) shall be limited such that the potential to emit (PTE) of styrene shall be limited such that the combined potential to emit (PTE) of any single HAP shall not exceed 9.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (2) **Methyl Methacrylate (MMA) (Single HAP)**  
The use of resin in the resin mixing and casting operation (Unit 01) shall be limited such that the potential to emit (PTE) of methyl methacrylate (MMA) shall be limited such that the combined potential to emit (PTE) of any single HAP shall not exceed 9.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (3) **Total HAPs**  
The use of resin in the resin mixing and casting operation (Unit 01) shall be limited such that the potential to emit (PTE) of the combination of HAPs in Unit 01 shall be limited such that the total HAPs shall not exceed 19.57 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of each single HAP to less than ten (10) tons per year, and total HAPs to less than twenty-five (25) tons per year and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable and make this source an area source of HAPs.

**326 IAC 2-6 (Emission Reporting)**

This source is still not subject to 326 IAC 2-6 (Emission Reporting) because it is still not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

**326 IAC 5-1 (Opacity Limitations)**

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(2)

#### 326 IAC 6.5 PM Limitations Except Lake County

This rule applies to sources or facilities located in the counties of Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne with PTE of 100 tons per year or more or actual emissions of 10 tons per year or more.

This source is subject to 326 IAC 6.5 because it is located in Marion County, and with actual emissions of 10 tons/year or more. However, this source is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. Therefore, 326 IAC 6.5-1-2(a) applies..

#### 326 IAC 6-4 (Fugitive Dust Emission Limitations)

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

### **State Rule Applicability – Individual Facilities**

#### 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)

The natural gas-fired furnaces, each, do not meet the definition of an indirect heating unit, as defined in 326 IAC 1-2-19. Therefore, the requirements of 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units) do not apply to this unit.

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

- (1) The unlimited potential to emit VOC from the solvent cleanup activities performed in the two (2) Instapak foam packaging spray stations is less than twenty-five (25) tons per year, therefore, the requirements of 326 IAC 8-1-6, do not apply, and are not included in the permit.
- (2) The unlimited potential to emit VOC from each of the new natural gas-fired furnaces is less than twenty-five (25) tons per year; therefore, the requirements of 326 IAC 8-1-6, do not apply, and are not included in the permit.

#### 326 IAC 8-2 (Surface Coating Emission Limitations)

- (1) The foam packaging material generated in the two (2) Instapak foam packaging spray stations does not meet the definition of a surface "coating", as defined in 326 IAC 8-1-0.5(b), since the foam material is not applied directly to the finished product, but is instead contained within a bag, which is then formed around the part to form cushioning during shipping. Therefore, the requirements of 326 IAC 8-2, do not apply, and are not included in the permit.
- (2) The unlimited potential to emit VOC from the solvent cleanup activities performed in the two (2) Instapak foam packaging spray stations is less than fifteen (15) pounds per day before add-on controls. Additionally, these activities are specifically exempted since the usage of cleanup solvents are not considered application of surface coatings, which are defined as protective, functional, or decorative films in § 8-1-0.5(b). Therefore, the requirements of 326 IAC 8-2, do not apply, and are not included in the permit.

### **State Rule Applicability – Individual Facilities**

#### **Resin Mixing And Casting Operation (Unit 01)**

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

The unlimited VOC potential emissions from the Resin Mixing And Casting Operation is greater than twenty-five (25) tons per year. However, the source shall limit the VOC potential emissions from the Resin Mixing And Casting Operation to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

The use of resins and solvents in the resin mixing and casting operation (Unit 01) shall be limited such that the potential to emit (PTE) of VOC shall be limited to 24.84 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits shall limit the potential to emit VOC from the Resin Mixing And Casting Operation (Unit 01) to less than twenty-five (25) tons per year and shall render 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable to the resin mixing and casting operation (Unit 01).

326 IAC 6.5 PM (Limitations Except Lake County)

The PM emissions from the emission units, identified as Unit 01 and Unit 02 shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

### **Degreasing Operations - Insignificant Activity**

326 IAC 8-3-2 (Cold Cleaner Operations)

The degreasing operation, an insignificant activity, is subject to this rule because it is a cold cleaner degreaser constructed after January 1, 1980.

326 IAC 8-3-8 (Material requirements for cold cleaner degreasers)

Pursuant to 326 IAC 8-3-1(c)(3)(B), the cold cleaner degreaser unit is subject to the requirements of 326 IAC 8-3-8 on and after January 1, 2015.

### **Metal Cutting Operation**

326 IAC 6.5 PM (Limitations Except Lake County)

The PM emissions from the Metal Cutting Operation shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

### **Metal Welding Operation**

326 IAC 6.5 PM (Limitations Except Lake County)

The PM emissions from the Metal Welding Operation shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

## **Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-8 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 2-8-4. 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.

- (a) There are no applicable compliance monitoring requirements. The resin mixing and casting operation (Unit 01) comply with 326 IAC 2-8 and 326 IAC 8-1-6 limits through record keeping and reporting requirements.
- (b) There are no applicable testing requirements.

### Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 13, 2015.

### Conclusion

The operation of this stationary cast polymer plumbing fixture manufacturing operation shall be subject to the conditions of the attached FESOP Renewal No. 097-36482-00676.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Amal Agharkar 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) 232-8422 or toll free at 1-800-451-6027 extension 2-8422.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations**  
**Potential to Emit of the Entire Source After Issuance of the Renewal**

Company Name: Willoughby Industries, Inc.  
Address City IN Zip: 5105 W. 78th St., Indianapolis, Indiana 46268  
Permit Number: 097-36482-00676  
Reviewer: Amal Agharkar  
Date: 03/17/16

Unlimited Potential to Emit (tons/year)										
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	Total HAPs	Worst Single HAP
Resin Mixing and Casting Operations (Unit 01)	-	-	-	-	-	31.89	-	-	30.57	15.48
Solid Surface Finishing Operation (SF)	21.90	21.90	21.90	-	-	-	-	-	-	-
Closed Injection Molding Operations/three scrap regrinder machines	0.53	0.53	0.53	-	-	0.01	-	-	1.27E-04	-
Welding Operation	1.33	1.33	1.33	-	-	-	-	-	0.12	0.06
Laser Cutting	6.61	6.61	6.61	-	-	-	-	-	-	-
Insignificant Activities										
Packaging Operations	-	-	-	-	-	5.22	-	-	5.22	5.22
Natural Gas Combustion	0.06	0.26	0.26	0.02	3.39	0.19	2.85	4,092.37	0.064	0.061
Woodworking	4.56	4.56	4.56	-	-	-	-	-	-	-
<b>TOTAL:</b>	<b>35.00</b>	<b>35.19</b>	<b>35.19</b>	<b>0.02</b>	<b>3.39</b>	<b>37.30</b>	<b>2.85</b>	<b>4,092.37</b>	<b>35.97</b>	<b>15.48</b>

Limited Potential to Emit (tons/year)										
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	CO2e	Total HAPs	Worst Single HAP
Resin Mixing and Casting Operations (Unit 01)	-	-	-	-	-	24.87	-	-	19.57	9.9 (Styrene)
Solid Surface Finishing Operation (SF)	21.90	21.90	21.90	-	-	-	-	-	-	-
Closed Injection Molding Operations/three scrap regrinder machines	0.53	0.53	0.53	-	-	0.01	-	-	1.27E-04	-
Welding Operation	1.33	1.33	1.33	-	-	-	-	-	0.12	0.06
Laser Cutting	6.61	6.61	6.61	-	-	-	-	-	-	-
NEW Insignificant Activities										
Packaging Operations	-	-	-	-	-	5.22	-	-	5.22	5.22 (MDI)
Natural Gas Combustion	0.06	0.26	0.26	0.02	3.39	0.19	2.85	4,092.37	0.06	0.06
Woodworking	4.56	4.56	4.56	-	-	-	-	-	-	-
<b>TOTAL:</b>	<b>35.00</b>	<b>35.19</b>	<b>35.19</b>	<b>0.02</b>	<b>3.39</b>	<b>30.28</b>	<b>2.85</b>	<b>4,092.37</b>	<b>24.95</b>	<b>&lt;10</b>

**NOTES**

Total emissions based on 8,760 hours/year

**Appendix A: Emissions Calculations  
VOC and HAP Emissions from the  
Packaging Operations  
Insignificant Activity**

**Company Name: Willoughby Industries, Inc.  
Address City IN Zip: 5105 W. 78th St., Indianapolis, Indiana 46268  
Permit Number: 097-36482-00676  
Reviewer: Amal Agharkar  
Date: 03/17/16**

<b>Process (Instapak Spray Stations)</b>	<b>Maximum Usage Rate (lbs/hr)</b>	<b>% VOC</b>	<b>VOC Emissions (tons/yr)</b>	<b>% MDI</b>	<b>MDI Emissions (tons/yr)</b>
Instapak Component "A"	2.644	45%	5.2113	45%	5.2113
Instapak Molding Foam Component "B"	1.582	-	-	-	-
Instaflex Component "B"	0.452	-	-	-	-
Instapak Port Cleaner	0.001	97%	0.0042	97%	0.0042
<b>Totals:</b>	<b>4.68</b>		<b>5.22</b>		<b>5.22</b>

**Notes**

Estimation Method: Mass Balance  
Pollutants Generated by Process: VOC and HAP (MDI)  
Source of VOC and HAP Content: Material Safety Data Sheets  
Pollution Control Equipment: None

The Instapak Foam is a product formed from a binary chemical system. Instapak Component A and Component B, or Instaflex Component "B", combine to form a Chemical Base that is used to create the foam.

**Methodology**Instapak Component "A"

Quantity of VOC emitted = (Maximum Usage Rate)(percent VOC)(1 ton/2,000 pounds)(8,760 hours/year)

Quantity of HAP emitted = (Maximum Usage Rate)(Percent HAP)(1 ton/2,000 pounds)(8,760 hours/year)

(Note: even though the MDI contained in the applied foam will polymerize, this computation assumes that all MDI is emitted.)

Instapak Component "B"

According to the MSDS supplied by the source, Instapak Component "B", and Instaflex Component "B", each, do not contain any VOCs or HAPS.

Instapak Port Cleaner

Quantity of VOC emitted = (Maximum Usage Rate)(percent VOC)(1 ton/2,000 pounds)(8,760 hours/year)

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

**Company Name: Willoughby Industries, Inc.  
Address City IN Zip: 5105 W. 78th St., Indianapolis, Indiana 46268  
Permit Number: 097-36482-00676  
Reviewer: Amal Agharkar  
Date: 03/17/16**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Unit Description
6.189	54.22	3 Natural Gas fired Furnaces, rated at 2.063 MMBtu, each
0.35	3.07	1 Natural Gas fired Furnace, rated at 0.35 MMBtu
0.25	2.19	1 Natural Gas fired Furnace, rated at 0.25 MMBtu
0.24	2.10	1 Natural Gas fired Furnace, rated at 0.24 MMBtu
0.36	3.15	2 Natural Gas fired Furnaces, rated at 0.18 MMBtu, each
0.23	2.01	2 Natural Gas fired Furnaces, rated at 0.115 MMBtu, each
0.12	1.05	2 Natural Gas fired Furnaces, rated at 0.06 MMBtu, each

7.74	67.79
------	-------

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.06	0.26	0.02	3.39	0.19	2.85

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

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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	7.118E-05	4.068E-05	2.542E-03	6.101E-02	1.152E-04

Emission Factor in lb/MMcf	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.695E-05	3.729E-05	4.746E-05	1.288E-05	7.118E-05	6.397E-02

#### Methodology

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

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

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 (SUPPLEMENT D 3/98)

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	4,067.62	0.08	0.07
Summed Potential Emissions in tons/yr	4,067.77		
CO2e Total in tons/yr	4,092.37		

#### Methodology

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

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

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

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

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

**Appendix A: Emissions Calculations  
Reinforced Plastics and Composites  
Open Molding Operations\*  
Resin Mixing and Casting (Unit 01)**

**Company Name: Willoughby Industries, Inc.  
Address City IN Zip: 5105 W. 78th St., Indianapolis, Indiana 46268  
Permit Number: 097-36482-00676  
Reviewer: Amal Agharkar  
Date: 03/17/16**

Emission Unit ID	Material (Resin or Gel Name)	UEF > 50 Styrene (lbs styrene/lbs resin)	UEF > 20 MMA (lbs MMA/lbs resin)	Weight % Monomer (as styrene) or VOC	Weight % MMA	CFA EF Constant	Percent VOC Emitted (%)	Maximum usage (lbs/hour)	Maximum Usage (lbs/month)	Potential VOC** &HAP (as styrene) (tons per month)	Potential VOC** &HAP (as styrene) (tons per year)	Potential VOC** &HAP (as MMA) (tons per month)	Potential VOC** &HAP (as MMA) (tons per year)	Total VOC emissions (tons/yr)
01	Resin	0.157	0.75	35.0%	5.0%	0.0165		91.90	67087.00	1.29	15.48	1.26	15.09	30.57
01	Catalyst	n/a		100.0%		n/a	2.0%	1	730.00	0.0073	0.09	n/a	n/a	0.09
01	mold release			99.0%		n/a	100.0%	0.07	51.10	0.0253	0.30	n/a	n/a	0.30
01	pigments	n/a		1.0%		n/a	100.0%	0.50	365.00	0.0018	0.02	n/a	n/a	0.02
01	pot-cleaner			100.0%		n/a	25.0%	0.83	605.90	0.0757	0.91	n/a	n/a	0.91
<b>Total Potential to Emit:</b>										1.40	16.80	1.26	15.09	31.89

\* Although this source only performs open molding 20% of the time and closed molding 80% of the time, the emission factors for open molding operations were used to represent the worst case emissions if only open molding was performed.

\*\* Catalyst, mold release, pigments and pot-cleaner are VOC only (i.e., no HAP as styrene).

**METHODOLOGY**

For the resin, which can be used as a gel coat per the MSDS (but is not in this case), it contains both styrene monomer and methyl methacrylate (MMA) monomer. Use the emission factors based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (July 23, 2001) to calculate resin emissions. UEF: The United Emission Factor is the emission factor for the resin styrene or MMA content determined using the 7/2001 UEF Table.

Maximum usage pounds per month = maximum usage lbs/hour x 8760 / 12 months per year

Resin - Potential VOC & HAP (as styrene) tons per month = [UEF Emission Factor (lb styrene/lb resin) x UEF MMA (lbs MMA/lbs resin) - Constant of 0.0165 (CFA EF) x max. usage (lbs/month) / 2000 lbs

Catalyst, mold release, pigments & pot cleaner - Potential VOC & HAP as styrene (tons per month) = weight % monomer x % VOC emitted \* max. usage (lbs/month) / 2000 (lb/ton)

Potential VOC & HAP (as styrene tons/year) = potential VOC & HAP (as styrene tons/month) x 12 (months/year)

Potential VOC & HAP (tons/month) = ( UEF MMA (lbs MMS/lbs resin) x Weight % Monomer \* max usage lb/month) / 2,000 (lb/ton)

Potential VOC & HAP as MMA = potential VOC & HAP (as MMA tons/month) x 12 months/year

Total VOC emissions( tons/year) = potential VOC & HAP (as styrene tons/year) + potential VOC & HAP as MMA

HAP Emissions = maximum usage (lbs/hour) x weight % of HAP x 4.38

Emission Unit ID	Material (Resin or Gel Name)	Density (Lb/Gal)	Maximum usage (lbs/hour)	Weight% Xylene	Weight% Cumene	Xylene Emissions (tons/yr)	Cumene Emissions (tons/yr)	Total HAP Emissions (tons/yr)
01	Catalyst	8.35	1	0.0%	0.0%	0.00	0.00	0.00
01	mold release	6.34	0.01	5.0%	2.0%	2.3E-03	9.0E-04	3.2E-03
01	pigments	17.36	0.50	0.0%	0.0%	0.00	0.00	0.00
01	pot-cleaner	8.86	0.83	0.0%	0.0%	0.00	0.00	0.00
						<b>2.3E-03</b>	<b>9.0E-04</b>	<b>0.0032</b>

15.48	HAP as Styrene tpy
15.09	HAP as MMA tpy
30.57	TOTAL HAPs

MEK had previously been included as a HAP but has been delisted.

**Appendix A: Emissions Calculations  
Reinforced Plastics and Composites  
Solid Surface Finishing Operation (SF)**

**Company Name: Willoughby Industries, Inc.**  
**Address City IN Zip: 5105 W. 78th St., Indianapolis, Indiana 46268**  
**Permit Number: 097-36482-00676**  
**Reviewer: Amal Agharkar**  
**Date: 03/17/16**

Fixtures were weighed before finishing (machining and sanding) and then weighed afterwards to determine the amount of material that was removed in the finishing processes. From that and the maximum production rates, the average hourly rate of total PM generated was determined to be 5.0 lbs/hour. <sup>(1)</sup>

$$5 \text{ lbs/hr} \times 8,760 \text{ hrs/yr} / 2,000 \text{ lbs/ton} = 21.9 \text{ tons/yr uncontrolled potential emissions (PM is assumed equal to PM10)}$$

The published dust collector equipment specifications were used for the control efficiency calculation -- "99.9% effective on particles as small as 1 micron." The capture efficiency of 99% was a number given for typical efficiency for the sanding booth design that is going to be used (3 walls and a ceiling with dust collectors mounted in the rear of the booth).

**Appendix A: Emissions Calculations**  
**Potential to Emit from the Van Dorn Injection Molding Units**  
**Processing Polypropylene with a 505 °F Melt Temperature**

**Company Name: Willoughby Industries, Inc.**  
**Address City IN Zip: 5105 W. 78th St., Indianapolis, Indiana 46268**  
**Permit Number: 097-36482-00676**  
**Reviewer: Amal Agharkar**  
**Date: 03/17/16**

VanDorn Machine #	Resin Type	Max Throughput Rate (lbs resin/hr)	PM			VOC		
			<sup>(1)</sup> Emission Factor (lbs/10 <sup>6</sup> lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	<sup>(1)</sup> Emission Factor (lbs/10 <sup>6</sup> lbs)	Emissions (lbs/hr)	Emissions (tons/yr)
IS	PP	21.58	34.5	7.45E-04	3.26E-03	80.3	0.00	0.01
<b>Totals</b>		<b>21.58</b>		<b>7.45E-04</b>	<b>3.26E-03</b>		<b>0.00</b>	<b>0.01</b>

**Methodology**

Emissions (lbs/hr) = Max Throughput Rate (lbs resin/hr) \* Emission Factor (lbs/10<sup>6</sup> lbs) / 1000000  
Emissions (tons/yr) = Emissions (lbs/hr) \* 8760 (hrs/yr) / 2000 (lbs/ton)

**Notes**

<sup>(1)</sup> Emission factors for PM & VOC from Polypropylene molding were taken from a technical paper, volume 49 in January 1999, published by the Journal of Air and Waste Management Association titled "Development of Emission Factors for Polypropylene Processing". A melt temperature of 505 °F and reactor impact copolymer was used as the emission factor. The worst case emission factor was used for all machines that process polypropylene along with other plastics.

<sup>(2)</sup> Polypropylene emission factors were the worst case emission factors for this machine and were used in lieu of the emission factors for PVC from the technical paper, "Process

<sup>(a)</sup> No emission factors from the Journal of Vinyl & Additive Technology were used. The emissions from PVC were reviewed and were determined to be lower than the PP emission factors, therefore the PP emission factors were used.

<sup>(3)</sup> Polypropylene emission factors were the worst case emission factors for this machine and were used in lieu of the emission factors for TPE from the technical paper, "Development of Emission Factors for Polyethylene Processing" from volume 46 of the Journal of Air and Waste Management Association.

<sup>(4)</sup> The polypropylene emission factor for PM was this worst case emission factor for this machine. The emission factor for VOC emissions come from the technical paper, "Sampling and Analysis of Volatile Organic Compounds Evolved During Thermal Processing of Acrylonitrile Butadiene Styrene Composite Resins", from volume 45 of the Journal of Air and Waste Management Association.

<sup>(5)</sup> Emission factors for PM & VOC from Nylon processing were the worst case emission factors and were used in lieu of the emission factors for polypropylene molding. The emission factors come from the technical paper, "Development of Emission Factors for Polyamide Processing", from Volume 51 of the Journal of Air and Waste Management Association. The source uses two types of nylon, PA-66 and EPDM Toughened PA-66, and the worst case emission factor for each nylon were used.

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

**Company Name: Willoughby Industries, Inc.  
Address City IN Zip: 5105 W. 78th St., Indianapolis, Indiana 46268  
Permit Number: 097-36482-00676  
Reviewer: Amal Agharkar  
Date: 03/17/16**

**HAP Emission Factors from Processing Polypropylene**

HAP Constituent	CAS #	<sup>(1)</sup> Emission Factor (lbs/10 <sup>6</sup> lbs)
Acetaldehyde	75-07-0	0.2
Acrolein	107-02-8	0.01
Formaldehyde	50-00-0	0.18
Propionaldehyde	123-38-6	0.95

**HAP Emission Factors from Processing Nylon**

HAP Constituent	CAS #	<sup>(2)</sup> Emission Factor (lbs/10 <sup>6</sup> lbs)
Styrene	100-42-5	0.32

**HAP Emission Factors from Processing ABS**

HAP Constituent	CAS #	<sup>(3)</sup> Emission Factor (lbs/10 <sup>6</sup> lbs)
Styrene	100-42-5	130

Dorel Machine #	Resin Type	Max Throughput Rate (lbs resin/hr)	Acetaldehyde Emissions (tons/yr)	Acrolein Emissions (tons/hr)	Formaldehyde Emissions (tons/yr)	Propionaldehyde Emissions (tons/yr)	Styrene Emissions (tons/yr)
IS	PP	21.58	1.89E-05	9.45E-07	1.70E-05	8.98E-05	NA
<b>Totals</b>			1.89E-05	9.45E-07	1.70E-05	8.98E-05	NA

**Methodology**

HAPs Emissions (tons/yr) = (Max Throughput Rate (lbs resin/hr) \* Emission Factor (lbs/10<sup>6</sup> lbs) / 1000000) \* 8760 (hrs/yr) / 2000 (lbs/ton)

**Notes**

<sup>(1)</sup> Emission factors for HAPs from Polypropylene molding were taken from a technical paper, volume 49 in January 1999, published by the Journal of Air and Waste Management Association titled "Development of Emission Factors for Polypropylene Processing". A melt temperature of 505 oF and reactor impact copolymer was used as the emission factor.

<sup>(2)</sup> Emission factors for HAPs from Nylon were taken from the technical paper, "Development of Emission Factors for Polyamide Processing", from Volume 51 of the Journal of Air and Waste Management Association. The source uses two types of nylon, PA-66 and EPDM Toughened PA-66, and the worst case emission factor for each nylon were used.

<sup>(3)</sup> Emission factors for HAPs from Nylon were taken from the technical paper, "Sampling and Analysis of Volatile Organic Compounds Evolved During Thermal Processing of Acrylonitrile Butadiene Styrene Composite Resins" from Volume 45 of the Journal of Air and Waste Management Association.

**Appendix A: Emissions Calculations**  
**Potential to Emit PM from the Closed Injection Molding Operation,**  
**Including three (3) scrap regrinder machines**

**Company Name: Willoughby Industries, Inc.**  
**Address City IN Zip: 5105 W. 78th St., Indianapolis, Indiana 46268**  
**Permit Number: 097-36482-00676**  
**Reviewer: Amal Agharkar**  
**Date: 03/17/16**

Maximum Hourly Injection Molding Machine Resin Throughput (lbs/hr)	91.90
Facility Wide Scrap (%) <sup>(2)</sup>	20.0%
Maximum Hourly Scrap Throughput (lbs/hr)	18.38
Grinding Emission Factor for PM (lbs/ton) <sup>(1)</sup>	1.30E+01
Control Efficiency of Cyclone and Bagfilter system	97.0%
Potential Hourly Uncontrolled PM Emissions (lbs/hr)	0.12
Potential Hourly Controlled PM Emissions (lbs/hr)	0.004
Potential Annual Uncontrolled PM Emissions (tons/yr)	0.52
Potential Annual Controlled PM Emissions (tons/yr) <sup>α</sup>	0.02

**Methodology**

Maximum Hourly Scrap Throughput (lbs/hr) = Maximum Hourly Resin Throughput (lbs/hr) \* Facility Wide Scrap (%)

Potential Hourly Uncontrolled PM Emissions (lbs/hr) = Maximum Hourly Scrap Throughput (lbs/hr) \* Grinding Emission Factor for PM (lbs/ton) / 2000 (lbs/ton)

Potential Hourly Controlled PM Emissions (lbs/hr) = Potential Hourly Uncontrolled Emissions (lbs/hr) x (1- Control Efficiency of Cyclone and Filter)

Potential Annual Uncontrolled PM Emissions (tons/yr) = Potential Hourly PM Emissions (lbs/hr) \* 8760 (hrs/yr) / 2000 (lbs/ton)

Potential Annual Controlled PM Emissions (tons/yr) = Potential Annual Uncontrolled PM Emissions (tons/yr) \* (1-Control Efficiency of Cyclone and Filter)

**Notes**

<sup>(1)</sup> No AP-42 emission factors exist for the grinding of thermoplastics. Therefore, the EPA Webfire emission factor for Fiberglass Resin Products - Plastics Machining: Drilling/Sanding/Sawing/etc. (SCC 30800701), has been used.

<sup>(2)</sup> This is based on the evaluation of the source on their injection molding process.

**Appendix A: Emission Calculations  
Laser Cutting**

**Company Name:** Willoughby Industries, Inc.  
**Address City IN Zip:** 5105 W. 78th St., Indianapolis, Indiana 46268  
**Permit Number:** 097-36482-00676  
**Reviewer:** Amal Agharkar  
**Date:** 03/17/16

**Laser Cutting**

1,000,000 lbs/year) \* (8760 hrs/year) \* 15 lbs PM/1000 lbs metal) \* 0.1 \* (1 ton/2000 lbs) \* 2 lasers = **6.61**

**Methodology**

To determine emissions from the machine the annual throughput was scaled up to 8760 hours per year, and assumed that 10% of the throughput was cut. An emission factor of 15.7 pounds of PM per 1,000 pounds metal throughput was used for the calculations.

Tons per year = 1,000,000 x 4.21 x 15.7/1000 x .10/2000

\* Based on a 2006 evaluation of the source by their consultant, it was determined 10% of the throughput is cut and the emission factor of 15.7 lbs/1000 lbs of metal was used. CDS did not verify the emission factor.

**Appendix A: Emissions Calculations  
Welding and Thermal Cutting**

Company Name: Willoughby Industries, Inc.  
Address City IN Zip: 5105 W. 78th St., Indianapolis, Indiana 46268  
Permit Number: 097-36482-00676  
Reviewer: Amal Agharkar  
Date: 03/17/16

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG)(carbon steel)	16	1.8		0.0055	0.0005			0.158	0.014	0.000	0	0.014
Tungsten Inert Gas (TIG)(carbon steel)	40	0.6		0.0055	0.0005			0.132	0.012	0.000	0	0.012
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Plasma**	1	0.375	150	0.0039				0.013	0.000	0.000	0.000	0.000
<b>EMISSION TOTALS</b>												
Potential Emissions lbs/hr								0.30				0.03
Potential Emissions lbs/day								7.29				0.63
Potential Emissions tons/year								1.33				0.12

**METHODOLOGY**

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

\*\*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.



# 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

April 1, 2016

David Schwartzkopf  
Willoughby Industries  
5105 W 78th St  
Indianapolis, IN 46268

Re: Public Notice  
Willoughby Industries  
Permit Level: FESOP - Renewal  
Permit Number: 097 - 36482 - 00676

Dear David Schwartzkopf:

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

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Indianapolis Star in Indianapolis, IN publish the abbreviated version of the public notice no later than April 5, 2016. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Pike Branch Library 6525 Zionsville Road Indianapolis IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Amal Agharkar, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 2-8422 or dial (317) 232-8422.

Sincerely,  
*Len Pogost*

Len Pogost  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover letter 2/17/2016



# Indiana Department of Environmental Management

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## **ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING**

March 31, 2016

Indianapolis Star  
Attn: Classifieds  
130 S. Meridian St.  
Indianapolis, Indiana 46225

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Willoughby Industries, Marion County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than April 5, 2016.

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

**To ensure proper payment, please reference account # 100174737.**

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

Sincerely,

*Len Pogost*

Len Pogost  
Permit Branch  
Office of Air Quality

Permit Level: FESOP - Renewal  
Permit Number: 097 - 36482 - 00676

Enclosure  
PN Newspaper.dot 6/13/2013



# Indiana Department of Environmental Management

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

April 1, 2016

To: Pike Branch Library 6525 Zionsville Road Indianapolis IN

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

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

**Applicant Name: Willoughby Industries**  
**Permit Number: 097 - 36482 - 00676**

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

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

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

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

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

Enclosures  
PN Library.dot 2/17/2016



# Indiana Department of Environmental Management

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

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## Notice of Public Comment

**April 1, 2016**  
**Willoughby Industries**  
**097 - 36482 - 00676**

Dear Concerned Citizen(s):

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

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

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

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

Enclosure  
PN AAA Cover.dot 2/17/2016

# Mail Code 61-53

IDEM Staff	LPOGOST 4/1/2016 Willoughby Industries Inc 097 - 36482 - 00676 draft/		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	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		

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		David Schwartzkopf Willoughby Industries Inc 5105 W 78th St Indianapolis IN 46268 (Source CAATS)									
2		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)									
3		Indianapolis City Council and Mayors office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)									
4		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)									
5		Pike Branch Library 6525 Zionsville Road Indianapolis IN 46268 (Library)									
6		Matt Mosier Office of Sustainability City-County Bldg/200 E Washington St. Rm# 2460 Indianapolis IN 46204 (Local Official)									
7		Johan & Susan Van Den Heuvel 4409 Blue Creek Drive Carmel IN 46033 (Affected Party)									
8		Indiana Members Credit Union 5103 Madison Avenue Indianapolis IN 46227 (Affected Party)									
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.
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