



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

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Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

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

for K & M Indiana LLC dba Mitchell Plastics in Clark County

FESOP Renewal No.: F019-36571-00103

The Indiana Department of Environmental Management (IDEM) has received an application from K & M Indiana LLC dba Mitchell Plastics located at 301 Pike Street, Charlestown, Indiana 47111 for a renewal of its FESOP issued on December 19, 2011. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow K & M Indiana LLC dba Mitchell Plastics 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:

Charlestown Clark County Public Library  
51 Clark Road  
Charlestown, IN 47111

and

IDEM Southeast Regional Office  
820 West Sweet Street  
Brownstown, IN 47220-9557

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 F 019-36571-00103 in all correspondence.

**Comments should be sent to:**

Monica Dick  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 4-1243  
Or dial directly: (317) 234-1243  
Fax: (317) 232-6749 attn: Monica Dick  
E-mail: mdick@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, at the IDEM Regional Office 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 Monica Dick of my staff at the above address.



Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality



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Michael R. Pence  
Governor

DRAFT

Carol S. Comer  
Commissioner

**Federally Enforceable State Operating Permit  
Renewal  
OFFICE OF AIR QUALITY**

**K & M Indiana LLC dba Mitchell Plastics  
301 Pike Street  
Charlestown, Indiana 47111**

(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.: F019-36571-00103	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date:  Expiration Date:

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## SECTION A SOURCE SUMMARY

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

The Permittee owns and operates a stationary plastic injection molded parts and surface coating operation.

Source Address:	301 Pike Street, Charlestown, Indiana 47111
General Source Phone Number:	812-256-3351
SIC Code:	3089 (Plastics Products, NEC)
County Location:	Clark
Source Location Status:	Nonattainment for PM <sub>2.5</sub> standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) spray booth, identified as SB-1, installed in November 2000, equipped with one (1) manual or robotic HVLP spray gun or an equivalent spray method with higher transfer efficiency, for plastic parts surface coating, with a maximum capacity of 240 units per hour, using water baffles for overspray control, with a flash off area (FO-1), and exhausting to two (2) stacks SPK-1, and SSB-1.
- (b) One (1) spray booth, identified as SB-2, installed in November 2014, equipped with two (2) manual or robotic HVLP spray guns or an equivalent spray method with higher transfer efficiency, for plastic parts surface coating, with a maximum combined capacity of 636 units per hour, using water baffles for overspray control, with a flash off area (FO-2), and exhausting to two (2) stacks SPK-2, and SSB-2.

This spray booth replaces an existing spray booth that was installed in November 2000.

- (c) One (1) spray booth, identified as SB-3, installed in November 2001, equipped with one (1) HVLP spray gun or an equivalent spray method with higher transfer efficiency, for painting plastic parts, with a maximum capacity of 240 units per hour, using a dry filter for overspray control, with a flash off area (FO-3), and exhausting to two (2) stacks SPK-3 and SSB-3.
- (d) One (1) spray booth, identified as SB-4, installed in 2011, equipped with three (3) HVLP spray guns or an equivalent spray method with higher transfer efficiency, for painting plastic parts, with a maximum combined capacity of 240 units per hour, using both a wet booth and dry filters as control, with a flash off area (FO-4), and exhausting to stack SSB-4.

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) Natural gas-fired heaters with heat input equal to or less than ten million (10,000,000) British thermal units per hour as follows [326 IAC 6.5-1-2]:
  - (1) Two (2) Omega Radiant Heaters, identified as RH1 and RH2, both installed in January 2007, each with a maximum heat input capacity of 0.40 MMBtu/hr, and all exhausting indoors.
  - (2) One (1) natural gas-fired Lennox Model 30 A Heater, identified as L1, installed in March 2000, with a maximum heat input capacity of 0.24 MMBtu/hr, and exhausting indoors.
  - (3) Four (4) natural gas-fired Air Rotation Units, identified as AR1 through AR4, all installed in March 2000, each with a maximum heat input capacity of 1.25 MMBtu/hr, and all exhausting indoors.
  
- (b) Natural gas-fired curing ovens with heat input equal to or less than ten million (10,000,000) British thermal units per hour as follows [326 IAC 6.5-1-2]:
  - (1) One (1) natural gas-fired curing oven, identified as CO-1, installed in November 2000, rated at 1.0 million British thermal units (MMBtu) per hour, and exhausting to stack SCO-1.
  - (2) One (1) natural gas-fired curing oven, identified as CO-2, installed in November 2000, rated at 1.0 million British thermal units (MMBtu) per hour, and exhausting to stack SCO-2.
  - (3) One (1) natural gas-fired curing oven, identified as CO-3, installed in November 2001, rated at 0.75 million British thermal units (MMBtu) per hour, used to cure the paint from SB-3, and exhausting to stack SCO-3.
  
- (c) Forty-nine (49) closed injection molding machines, no control, and all exhausting to the inside of the building including the following [326 IAC 6.5-1-2]:
  - (1) One (1) 40-Ton Injection Molding Machine, identified as D.A. #562, installed in 2000, with a maximum throughput rate of 9.76 pounds of resin per hour.
  - (2) One (1) 40-Ton Injection Molding Machine, identified as D.A. #959, installed in 2002, with a maximum throughput rate of 8.77 pounds of resin per hour.
  - (3) One (1) 40-Ton Injection Molding Machine, identified as D.A. #561, installed in 2000, with a maximum throughput rate of 1.98 pounds of resin per hour.
  - (4) One (1) 40-Ton Injection Molding Machine, identified as D.A. #1151, installed in 2004, with a maximum throughput rate of 4.44 pounds of resin per hour.
  - (5) One (1) 40-Ton Injection Molding Machine, identified as D.A. #563, installed in 2000, with a maximum throughput rate of 13.73 pounds of resin per hour.
  - (6) One (1) 50-Ton Injection Molding Machine, identified as D.A. #2277, installed in 2011, with a maximum throughput rate of 115.0 pounds of resin per hour.
  - (7) One (1) 55-Ton Injection Molding Machine, identified as D.A. #2245, installed in 2011, with a maximum throughput rate of 3.74 pounds of resin per hour.

- (8) One (1) 75-Ton Injection Molding Machine, identified as D.A. #578, installed in 2015, with a maximum throughput rate of 9.23 pounds of resin per hour.
- (9) One (1) 75-Ton Injection Molding Machine, identified as D.A. #2006, installed in 2000, with a maximum throughput rate of 10.89 pounds of resin per hour.
- (10) One (1) 75-Ton Injection Molding Machine, identified as D.A. #576, installed in 2000, with a maximum throughput rate of 13.58 pounds of resin per hour.
- (11) One (1) 80-Ton Injection Molding Machine, One (1) identified as D.A. #1007, installed in 2003, with a maximum throughput rate of 5.45 pounds of resin per hour.
- (12) One (1) 85-Ton Injection Molding Machine, identified as D.A. #2242, installed in 2011, with a maximum throughput rate of 4.05 pounds of resin per hour.
- (13) One (1) 85-Ton Injection Molding Machine, identified as D.A. #2244, installed in 2011, with a maximum throughput rate of 59.4 pounds of resin per hour.
- (14) One (1) 90-Ton Injection Molding Machine, identified as D.A. #288, installed in 1994, with a maximum throughput rate of 29.85 pounds of resin per hour.
- (15) One (1) 100-Ton Injection Molding Machine, identified as D.A. #573, installed in 2000, with a maximum throughput rate of 11.87 pounds of resin per hour.
- (16) One (1) 100-Ton Injection Molding Machine, identified as D.A. #962, installed in 2002, with a maximum throughput rate of 16.16 pounds of resin per hour.
- (17) One (1) 100-Ton Injection Molding Machine identified as D.A. #1029, installed in 2004, with a maximum throughput rate of 24.09 pounds of resin per hour.
- (18) One (1) 100-Ton Injection Molding Machine, identified as D.A. #1030, installed in 2004, with a maximum throughput rate of 21.96 pounds of resin per hour.
- (19) One (1) 100-Ton Injection Molding Machine, identified as D.A. #1200, installed in 2004, with a maximum throughput rate of 17.09 pounds of resin per hour.
- (20) One (1) 100-Ton Injection Molding Machine, identified as D.A. #2511, installed in 2013, with a maximum throughput rate of 4.9 pounds of resin per hour.
- (21) One (1) 100-Ton Injection Molding Machine, identified as D.A. #2512, installed in 2013, with a maximum throughput rate of 25 pounds of resin per hour.
- (22) One (1) 160-Ton Injection Molding Machine, identified as D.A. #572, installed in 2000, with a maximum throughput rate of 24.51 pounds of resin per hour.
- (23) One (1) 160-Ton Injection Molding Machine, identified as D.A. #570, installed in 2000, with a maximum throughput rate of 14.27 pounds of resin per hour.
- (24) One (1) 180-Ton Injection Molding Machine, identified as D.A. #305T, installed in 2014, with a maximum throughput rate of 182 pounds of resin per hour.
- (25) One (1) 180-Ton Injection Molding Machine, identified as D.A. #450T, installed in 2014, with a maximum throughput rate of 150 pounds of resin per hour.

- (26) One (1) 180-Ton Injection Molding Machine, identified as D.A. #860T, installed in 2015, with a maximum throughput rate of 60 pounds of resin per hour.
- (27) One (1) 180-Ton Injection Molding Machine, identified as D.A. #2517, installed in 2012, with a maximum throughput rate of 88 pounds of resin per hour.
- (28) One (1) 200-Ton Injection Molding Machine, identified as D.A. #272, installed in 1997, with a maximum throughput rate of 17.65 pounds of resin per hour.
- (29) One (1) 220-Ton Injection Molding Machine, identified as D.A. #1196, installed in 2004, with a maximum throughput rate of 20.96 pounds of resin per hour.
- (30) One (1) 220-Ton Injection Molding Machine, identified as D.A. #1195, installed in 2004, with a maximum throughput rate of 27.21 pounds of resin per hour.
- (31) One (1) 280-Ton Injection Molding Machine, identified as D.A. #569, installed in 2000, with a maximum throughput rate of 29.29 pounds of resin per hour.
- (32) One (1) 280-Ton Injection Molding Machine, identified as D.A. #2518, installed in 2013, with a maximum throughput rate of 16.5 pounds of resin per hour.
- (33) One (1) 350-Ton Injection Molding Machine, identified as D.A. #2278, installed in 2011, with a maximum throughput rate of 115.0 pounds of resin per hour.
- (34) One (1) 350-Ton Injection Molding Machine, identified as D.A. #568, installed in 2000, with a maximum throughput rate of 25.80 pounds of resin per hour.
- (35) One (1) 350-Ton Injection Molding Machine, identified as D.A. #565, installed in 2000, with a maximum throughput rate of 106.23 pounds of resin per hour.
- (36) One (1) 350-Ton Injection Molding Machine, identified as D.A. #368, installed in 2000, with a maximum throughput rate of 20.72 pounds of resin per hour.
- (37) One (1) 350-Ton Injection Molding Machine, identified as D.A. #567, installed in 2000, with a maximum throughput rate of 8.04 pounds of resin per hour.
- (38) One (1) 350-Ton Injection Molding Machine, identified as D.A. #566, installed in 2000, with a maximum throughput rate of 14.90 pounds of resin per hour.
- (39) One (1) 350-Ton Injection Molding Machine, identified as D.A. #564, installed in 2000, with a maximum throughput rate of 114.67 pounds of resin per hour.
- (40) One (1) 350-Ton Injection Molding Machine, identified as D.A. #1013, installed in 2004, with a maximum throughput rate of 61.22 pounds of resin per hour.
- (41) One (1) 350-Ton Injection Molding Machine, identified as D.A. #2035, installed in 2002, transfer machine, with a maximum throughput rate of 59.16 pounds of resin per hour.
- (42) One (1) 350-Ton Injection Molding Machine, identified as D.A. # 2513, installed in 2013, with a maximum throughput rate of 116 pounds of resin per hour.
- (43) One (1) 350-Ton Injection Molding Machine, identified as D.A. # 2514, installed in 2013, with a maximum throughput rate of 116 pounds of resin per hour.
- (44) One (1) 350-Ton Injection Molding Machine, identified as D.A. # 2515, installed in

2013, with a maximum throughput rate of 36 pounds of resin per hour.

- (45) One (1) 390-Ton Injection Molding Machine, identified as D.A. #2099, installed in 2008, with a maximum throughput rate of 12.49 pounds of resin per hour.
- (46) One (1) 450-Ton Injection Molding Machine, identified as D.A. #1372, installed in 2005, with a maximum throughput rate of 56.80 pounds of resin per hour.
- (47) One (1) 450-Ton Injection Molding Machine, identified as D.A. #2282, installed in 2011, with a maximum throughput rate of 59.56 pounds of resin per hour.
- (48) One (1) 550-Ton Injection Molding Machine, identified as D.A. #668, installed in 2000, with a maximum throughput rate of 41.50 pounds of resin per hour.
- (49) One 55-Ton Injection Molding Machine, identified as D.A. #2348, installed in 2012, with a maximum throughput rate of 77.19 pounds of resin per hour.

(d) Paved roads and paved parking lots with public access. [326 IAC 6-4]

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

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]

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)]

- (a) This permit, F019-36571-00103, 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]

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]

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)]

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)]

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)]

- (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)]

- (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]

- (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 or Southeast Regional Office 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  
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

- (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 F019-36571-00103 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)]

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]

- (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)]

- (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]

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]

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

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

**C.2 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.3 Opacity [326 IAC 5-1]**

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

- (a) Opacity shall not exceed an average of 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.4 Open Burning [326 IAC 4-1][IC 13-17-9]

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. 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.8 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.9 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

### **C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

## **Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

### **C.12 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]**

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]

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.14 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.15 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.16 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.17 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) spray booth, identified as SB-1, installed in November 2000, equipped with one (1) manual or robotic HVLP spray gun or an equivalent spray method with higher transfer efficiency, for plastic parts surface coating, with a maximum capacity of 240 units per hour, using water baffles for overspray control, with a flash off area (FO-1), and exhausting to two (2) stacks SPK-1, and SSB-1.
- (b) One (1) spray booth, identified as SB-2, installed in November 2014, equipped with two (2) manual or robotic HVLP spray guns or an equivalent spray method with higher transfer efficiency, for plastic parts surface coating, with a maximum combined capacity of 636 units per hour, using water baffles for overspray control, with a flash off area (FO-2), and exhausting to two (2) stacks SPK-2, and SSB-2.  
  
This spray booth replaces an existing spray booth that was installed in November 2000.
- (c) One (1) spray booth, identified as SB-3, installed in November 2001, equipped with one (1) HVLP spray gun or an equivalent spray method with higher transfer efficiency, for painting plastic parts, with a maximum capacity of 240 units per hour, using a dry filter for overspray control, with a flash off area (FO-3), and exhausting to two (2) stacks SPK-3 and SSB-3.
- (d) One (1) spray booth, identified as SB-4, installed in 2011, equipped with three (3) HVLP spray guns or an equivalent spray method with higher transfer efficiency, for painting plastic parts, with a maximum combined capacity of 240 units per hour, using both a wet booth and dry filters as control, with a flash off area (FO-4), and exhausting to stack SSB-4.

(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 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 not applicable, the Permittee shall comply with the following:

The VOC input (including dilution and cleaning solvents) to spray booths SB-1, SB-2, SB-3 and SB-4 combined shall be less than 98.71 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC from the entire source to less than 100 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-7 not applicable.

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

In order to render the requirements of 326 IAC 8-1-6 not applicable, when coating plastic parts in spray booths SB-1, SB-2, SB-3, and SB-4, the Permittee shall comply with the following:

- (1) The volatile organic compounds (VOC) input (including dilution and cleaning solvents) to the spray booth, identified as SB-1, shall be less than twenty-five (25) tons per year per twelve (12) consecutive month period each, with compliance determined at the end of each month.

- (2) The volatile organic compounds (VOC) input (including dilution and cleaning solvents) to the spray booth, identified as SB-2, shall be less than twenty-five (25) tons per year per twelve (12) consecutive month period each, with compliance determined at the end of each month.
- (3) The volatile organic compounds (VOC) input (including dilution and cleaning solvents) to the spray booth, identified as SB-3, shall be less than twenty-five (25) tons per year per twelve (12) consecutive month period each, with compliance determined at the end of each month.
- (4) The volatile organic compounds (VOC) input (including dilution and cleaning solvents) to the spray booth, identified as SB-4, shall be less than twenty-five (25) tons per year per twelve (12) consecutive month period each, with compliance determined at the end of each month.

Compliance with the above limits shall limit the potential to emit VOC from the spray booths SB-1, SB-2, SB-3, and SB-4, each to less than twenty-five (25) tons per 12 consecutive month period and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

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

Pursuant to 326 IAC 6.5-1-2(h), surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the source shall operate the control device in accordance with manufacturer's specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)][326 IAC 1-6-3]

A Preventative Maintenance Plan is required for these facilities and any 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 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 Particulate Control [326 IAC 6.5-1-2]

- (1) In order to comply with Condition D.1.3, the water baffles for overspray control shall be in operation and control emissions from the spray booth, identified as SB-1, at all times that the spray booth, identified as SB-1, is in operation.
- (2) In order to comply with Condition D.1.3, the water baffles for overspray control shall be in operation and control emissions from the spray booth, identified as SB-2, at all times that the spray booth, identified as SB-2, is in operation.
- (3) In order to comply with Condition D.1.3, the dry filter for overspray control shall be in operation and control emissions from the spray booth, identified as SB-3, at all times that the spray booth, identified as SB-3, is in operation.
- (4) In order to comply with Condition D.1.3, the wet booth and dry filters for control shall be in operation and control emissions from the spray booth, identified as SB-4, at all times that the spray booth, identified as SB-4 is in operation.

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

### D.1.7 Monitoring [326 IAC 6.5-1-2]

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- (a) **Dry filters**  
Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray booths SB-3 and SB-4 stacks (SPK-3, SSB-3, SPK-4 and SSB-4) while one or more of the booths are in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.
- (b) **Water baffles**
- (i) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level.
- (ii) To monitor the performance of each of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan.
- (iii) To monitor the performance of each of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer.
- (iv) In addition, weekly observations shall be made of the overspray from the spray booths SB-1 and SB-2 stacks (SPK-1, SSB-1, SPK-2, and SSB-2,) while one or more of the booths are in operation.
- If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.
- (c) Monthly inspections shall be performed of the coating emissions from the stacks SPK-1, SSB-1, SPK-2, SSB-2, SPK-3, SSB-3, SPK-4 and SSB-4 and the presence of overspray on the rooftops and the nearby ground. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

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

### D.1.8 Record Keeping Requirement [326 IAC 2-8-4] [326 IAC 8-1-6]

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- (a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets

(MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) The log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document the compliance status with Conditions D.1.7(a), the Permittee shall maintain a log of daily inspections and weekly overspray observations
  - (c) To document the compliance status with Conditions D.1.7(b), the Permittee shall maintain a log of daily and weekly inspections, weekly maintenance and weekly overspray observations.
  - (d) To document the compliance status with Conditions D.1.7(c), the Permittee shall maintain a log of the monthly inspections.
  - (e) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.9 Reporting Requirements [326 IAC 2-8-4] [326 IAC 8-1-6]

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet 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:**

Insignificant activities:

- (a) Natural gas-fired heaters with heat input equal to or less than ten million (10,000,000) British thermal units per hour as follows [326 IAC 6.5-1-2]:
  - (1) Two (2) Omega Radiant Heaters, identified as RH1 and RH2, both installed in January 2007, each with a maximum heat input capacity of 0.40 MMBtu/hr, and all exhausting indoors.
  - (2) One (1) natural gas-fired Lennox Model 30 A Heater, identified as L1, installed in March 2000, with a maximum heat input capacity of 0.24 MMBtu/hr, and exhausting indoors.
  - (3) Four (4) natural gas-fired Air Rotation Units, identified as AR1 through AR4, all installed in March 2000, each with a maximum heat input capacity of 1.25 MMBtu/hr, and all exhausting indoors.
- (b) Natural gas-fired curing ovens with heat input equal to or less than ten million (10,000,000) British thermal units per hour as follows [326 IAC 6.5-1-2]:
  - (1) One (1) natural gas-fired curing oven, identified as CO-1, installed in November 2000, rated at 1.0 million British thermal units (MMBtu) per hour, and exhausting to stack SCO-1.
  - (2) One (1) natural gas-fired curing oven, identified as CO-2, installed in November 2000, rated at 1.0 million British thermal units (MMBtu) per hour, and exhausting to stack SCO-2.
  - (3) One (1) natural gas-fired curing oven, identified as CO-3, installed in November 2001, rated at 0.75 million British thermal units (MMBtu) per hour, used to cure the paint from SB-3, and exhausting to stack SCO-3.
- (c) Forty-nine (49) closed injection molding machines, no control, and all exhausting to the inside of the building including the following [326 IAC 6.5-1-2]:
  - (1) One (1) 40-Ton Injection Molding Machine, identified as D.A. #562, installed in 2000, with a maximum throughput rate of 9.76 pounds of resin per hour.
  - (2) One (1) 40-Ton Injection Molding Machine, identified as D.A. #959, installed in 2002, with a maximum throughput rate of 8.77 pounds of resin per hour.
  - (3) One (1) 40-Ton Injection Molding Machine, identified as D.A. #561, installed in 2000, with a maximum throughput rate of 1.98 pounds of resin per hour.
  - (4) One (1) 40-Ton Injection Molding Machine, identified as D.A. #1151, installed in 2004, with a maximum throughput rate of 4.44 pounds of resin per hour.
  - (5) One (1) 40-Ton Injection Molding Machine, identified as D.A. #563, installed in 2000, with a maximum throughput rate of 13.73 pounds of resin per hour.

- (6) One (1) 50-Ton Injection Molding Machine, identified as D.A. #2277, installed in 2011, with a maximum throughput rate of 115.0 pounds of resin per hour.
- (7) One (1) 55-Ton Injection Molding Machine, identified as D.A. #2245, installed in 2011, with a maximum throughput rate of 3.74 pounds of resin per hour.
- (8) One (1) 75-Ton Injection Molding Machine, identified as D.A. #578, installed in 2015, with a maximum throughput rate of 9.23 pounds of resin per hour.
- (9) One (1) 75-Ton Injection Molding Machine, identified as D.A. #2006, installed in 2000, with a maximum throughput rate of 10.89 pounds of resin per hour.
- (10) One (1) 75-Ton Injection Molding Machine, identified as D.A. #576, installed in 2000, with a maximum throughput rate of 13.58 pounds of resin per hour.
- (11) One (1) 80-Ton Injection Molding Machine, One (1) identified as D.A. #1007, installed in 2003, with a maximum throughput rate of 5.45 pounds of resin per hour.
- (12) One (1) 85-Ton Injection Molding Machine, identified as D.A. #2242, installed in 2011, with a maximum throughput rate of 4.05 pounds of resin per hour.
- (13) One (1) 85-Ton Injection Molding Machine, identified as D.A. #2244, installed in 2011, with a maximum throughput rate of 59.4 pounds of resin per hour.
- (14) One (1) 90-Ton Injection Molding Machine, identified as D.A. #288, installed in 1994, with a maximum throughput rate of 29.85 pounds of resin per hour.
- (15) One (1) 100-Ton Injection Molding Machine, identified as D.A. #573, installed in 2000, with a maximum throughput rate of 11.87 pounds of resin per hour.
- (16) One (1) 100-Ton Injection Molding Machine, identified as D.A. #962, installed in 2002, with a maximum throughput rate of 16.16 pounds of resin per hour.
- (17) One (1) 100-Ton Injection Molding Machine identified as D.A. #1029, installed in 2004, with a maximum throughput rate of 24.09 pounds of resin per hour.
- (18) One (1) 100-Ton Injection Molding Machine, identified as D.A. #1030, installed in 2004, with a maximum throughput rate of 21.96 pounds of resin per hour.
- (19) One (1) 100-Ton Injection Molding Machine, identified as D.A. #1200, installed in 2004, with a maximum throughput rate of 17.09 pounds of resin per hour.
- (20) One (1) 100-Ton Injection Molding Machine, identified as D.A. #2511, installed in 2013, with a maximum throughput rate of 4.9 pounds of resin per hour.
- (21) One (1) 100-Ton Injection Molding Machine, identified as D.A. #2512, installed in 2013, with a maximum throughput rate of 25 pounds of resin per hour.
- (22) One (1) 160-Ton Injection Molding Machine, identified as D.A. #572, installed in 2000, with a maximum throughput rate of 24.51 pounds of resin per hour.
- (23) One (1) 160-Ton Injection Molding Machine, identified as D.A. #570, installed in 2000, with a maximum throughput rate of 14.27 pounds of resin per hour.

- (24) One (1) 180-Ton Injection Molding Machine, identified as D.A. #305T, installed in 2014, with a maximum throughput rate of 182 pounds of resin per hour.
- (25) One (1) 180-Ton Injection Molding Machine, identified as D.A. #450T, installed in 2014, with a maximum throughput rate of 150 pounds of resin per hour.
- (26) One (1) 180-Ton Injection Molding Machine, identified as D.A. #860T, installed in 2015, with a maximum throughput rate of 60 pounds of resin per hour.
- (27) One (1) 180-Ton Injection Molding Machine, identified as D.A. #2517, installed in 2012, with a maximum throughput rate of 88 pounds of resin per hour.
- (28) One (1) 200-Ton Injection Molding Machine, identified as D.A. #272, installed in 1997, with a maximum throughput rate of 17.65 pounds of resin per hour.
- (29) One (1) 220-Ton Injection Molding Machine, identified as D.A. #1196, installed in 2004, with a maximum throughput rate of 20.96 pounds of resin per hour.
- (30) One (1) 220-Ton Injection Molding Machine, identified as D.A. #1195, installed in 2004, with a maximum throughput rate of 27.21 pounds of resin per hour.
- (31) One (1) 280-Ton Injection Molding Machine, identified as D.A. #569, installed in 2000, with a maximum throughput rate of 29.29 pounds of resin per hour.
- (32) One (1) 280-Ton Injection Molding Machine, identified as D.A. #2518, installed in 2013, with a maximum throughput rate of 16.5 pounds of resin per hour.
- (33) One (1) 350-Ton Injection Molding Machine, identified as D.A. #2278, installed in 2011, with a maximum throughput rate of 115.0 pounds of resin per hour.
- (34) One (1) 350-Ton Injection Molding Machine, identified as D.A. #568, installed in 2000, with a maximum throughput rate of 25.80 pounds of resin per hour.
- (35) One (1) 350-Ton Injection Molding Machine, identified as D.A. #565, installed in 2000, with a maximum throughput rate of 106.23 pounds of resin per hour.
- (36) One (1) 350-Ton Injection Molding Machine, identified as D.A. #368, installed in 2000, with a maximum throughput rate of 20.72 pounds of resin per hour.
- (37) One (1) 350-Ton Injection Molding Machine, identified as D.A. #567, installed in 2000, with a maximum throughput rate of 8.04 pounds of resin per hour.
- (38) One (1) 350-Ton Injection Molding Machine, identified as D.A. #566, installed in 2000, with a maximum throughput rate of 14.90 pounds of resin per hour.
- (39) One (1) 350-Ton Injection Molding Machine, identified as D.A. #564, installed in 2000, with a maximum throughput rate of 114.67 pounds of resin per hour.
- (40) One (1) 350-Ton Injection Molding Machine, identified as D.A. #1013, installed in 2004, with a maximum throughput rate of 61.22 pounds of resin per hour.
- (41) One (1) 350-Ton Injection Molding Machine, identified as D.A. #2035, installed in 2002, transfer machine, with a maximum throughput rate of 59.16 pounds of resin per hour.

- (42) One (1) 350-Ton Injection Molding Machine, identified as D.A. # 2513, installed in 2013, with a maximum throughput rate of 116 pounds of resin per hour.
- (43) One (1) 350-Ton Injection Molding Machine, identified as D.A. # 2514, installed in 2013, with a maximum throughput rate of 116 pounds of resin per hour.
- (44) One (1) 350-Ton Injection Molding Machine, identified as D.A. # 2515, installed in 2013, with a maximum throughput rate of 36 pounds of resin per hour.
- (45) One (1) 390-Ton Injection Molding Machine, identified as D.A. #2099, installed in 2008, with a maximum throughput rate of 12.49 pounds of resin per hour.
- (46) One (1) 450-Ton Injection Molding Machine, identified as D.A. #1372, installed in 2005, with a maximum throughput rate of 56.80 pounds of resin per hour.
- (47) One (1) 450-Ton Injection Molding Machine, identified as D.A. #2282, installed in 2011, with a maximum throughput rate of 59.56 pounds of resin per hour.
- (48) One (1) 550-Ton Injection Molding Machine, identified as D.A. #668, installed in 2000, with a maximum throughput rate of 41.50 pounds of resin per hour.
- (49) One 55-Ton Injection Molding Machine, identified as D.A. #2348, installed in 2012, with a maximum throughput rate of 77.19 pounds of resin per hour.

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

Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from the Injection Molding Machines, curing ovens, and heaters shall each not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

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

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

Source Name: K & M Indiana LLC dba Mitchell Plastics  
Source Address: 301 Pike Street, Charlestown, Indiana 47111  
FESOP Permit No.: F019-36571-00103

**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: K & M Indiana LLC dba Mitchell Plastics  
Source Address: 301 Pike Street, Charlestown, Indiana 47111  
FESOP Permit No.: F019-36571-00103

**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: K & M Indiana LLC dba Mitchell Plastics  
Source Address: 301 Pike Street, Charlestown, Indiana 47111  
FESOP Permit No.: F019-36571-00103  
Facility: Spray Booth SB-1  
Parameter: Volatile organic compounds (VOC) input  
Limit: Shall be less than twenty-five (25) tons per year per twelve (12) consecutive month period each, 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: K & M Indiana LLC dba Mitchell Plastics  
Source Address: 301 Pike Street, Charlestown, Indiana 47111  
FESOP Permit No.: F019-36571-00103  
Facility: Spray Booth SB-2  
Parameter: Volatile organic compounds (VOC) input  
Limit: Shall be less than twenty-five (25) tons per year per twelve (12) consecutive month period each, 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: K & M Indiana LLC dba Mitchell Plastics  
Source Address: 301 Pike Street, Charlestown, Indiana 47111  
FESOP Permit No.: F019-36571-00103  
Facility: Spray Booth SB-3  
Parameter: Volatile organic compounds (VOC) input  
Limit: Shall be less than twenty-five (25) tons per year per twelve (12) consecutive month period each, 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: K & M Indiana LLC dba Mitchell Plastics  
Source Address: 301 Pike Street, Charlestown, Indiana 47111  
FESOP Permit No.: F019-36571-00103  
Facility: Spray Booth SB-4  
Parameter: Volatile organic compounds (VOC) input  
Limit: Shall be less than twenty-five (25) tons per year per twelve (12) consecutive month period each, 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: K & M Indiana LLC dba Mitchell Plastics  
Source Address: 301 Pike Street, Charlestown, Indiana 47111  
FESOP Permit No.: F019-36571-00103  
Facility: Spray Booths SB-1, SB-2, SB-3 and SB-4  
Parameter: Volatile organic compounds (VOC) input  
Limit: Combined shall be less than 98.71 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  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: K & M Indiana LLC dba Mitchell Plastics  
Source Address: 301 Pike Street, Charlestown, Indiana 47111  
FESOP Permit No.: F019-36571-00103

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

**Source Background and Description**

<b>Source Name:</b>	<b>K &amp; M Indiana LLC dba Mitchell Plastics</b>
<b>Source Location:</b>	<b>301 Pike Street, Charlestown, Indiana 47111</b>
<b>County:</b>	<b>Clark (Charlestown Township)</b>
<b>SIC Code:</b>	<b>3089 (Plastic Products, Not Elsewhere Classified)</b>
<b>Permit Renewal No.:</b>	<b>F019-36571-00103</b>
<b>Permit Reviewer:</b>	<b>Monica Dick</b>

On December 8, 2015, the Office of Air Quality (OAQ) received an application from K & M Indiana LLC dba Mitchell Plastics relating to the operation of a plastic injection molded parts and surface coating operation requesting to renewal of its operating permit. K & M Indiana LLC dba Mitchell Plastics was issued its first FESOP F019-30695-00103 on December 19, 2011.

**Source Definition**

This major source determination is for the following plants:

- (a) Plant 1: K & M Indiana LLC dba Mitchell Plastics, located at 301 Pike Street, Charlestown, Indiana, 47111.
- (b) Plant 2: Corvac Composites, LLC, located at 101 Quality Court, Charlestown, Indiana, 47111.

The plants do not meet all three parts of the major source definition. Therefore, IDEM, OAQ has determined that these plants are not part of the same major source, as defined by 326 IAC 2-7-1(22). This determination is made under FESOP Renewal 019-36571-00103.

Plant 1 is a plastic injection molded parts and surface coating operation, owned and operated by K & M Indiana LLC dba Mitchell Plastics, Plant ID: 019-00103.

Plant 2 is a thermoforming manufacturing facility of airflow and water deflection systems for automotive applications, owned and operated by Corvac Composites, LLC.

The plants are located across a public road from each other. Previously, both were owned and operated by K & M Indiana LLC. However, K & M Indiana LLC sold Plant 2 and is no longer associated with its operation.

IDEM, OAQ has examined whether Plant 1 and Plant 2 are part of the same major source. The term "major source" is defined at 326 Indiana Administrative Code (IAC) 2-7-1(22). The entire Indiana Administrative Code is available at <http://www.in.gov/legislative/iac/> on the Internet. In order for these plants to be considered one major source they must meet all three of the following criteria:

- (1) the plants must be under common ownership or common control;
- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,
- (3) the plants must be located on the same, contiguous or adjacent properties.

Plant 1 is owned and operated by K & M Indiana LLC dba Mitchell Plastics. Plant 2 is owned and operated by Corvac Composites, LLC. There is no third person or persons who own 51% or more of K & M Indiana LLC and Corvac Composites, LLC. The plants are not under common ownership.

Where there is no common ownership, IDEM, OAQ must determine if there is common control. IDEM's Nonrule Policy Document Air-005 applies to the definition of major source in 326 IAC 2-7-1(22). All of IDEM's nonrule policies are available at <http://www.in.gov/idem/4694.htm> on IDEM's website. NPD Air-005 sets out two independent tests to determine if common control exists.

The first test, the auxiliary activity test, determines whether one source performs an auxiliary activity which directly serves the purpose of the primary activity and whether the owner or operator of the primary activity has a major role in the day-to-day operations of the auxiliary activity. An auxiliary activity directly serves the purpose of a primary activity by supplying a necessary raw material to the primary activity or performing an integral part of the production process for the primary activity.

Day-to-day control of the auxiliary activity by the primary activity may be evidenced by several factors, including:

- Is a majority of the output of the auxiliary activity provided to the primary activity?
- Can the auxiliary activity contract to provide its products/services to a third-party without the consent of the primary activity?
- Can the primary activity assume control of the auxiliary activity under certain circumstances?
- Is the auxiliary activity required to complete periodic reports to the primary activity?

If one or a combination of these questions is answered affirmatively, common control may exist.

Neither plant sends any output to the other plant. Neither plant performs any process for the other plant. Neither plant has any control over the other plant's ability to contract with third parties. Neither plant can assume control of the other plant under any circumstance. Neither plant submits any reports to the other plant. Neither plant has a major role in the day-to-day operations of the other plant. Therefore, the first common control test is not met.

The second common control test in the nonrule policy is the but/for test. This test focuses on whether the auxiliary activity would exist absent the needs of the primary activity. If all or a majority of the output of the auxiliary activity is consumed by the primary activity the but/for test is satisfied. Neither plant sends any output to the other plant. Neither plant needs the other plant in order to operate. Therefore, the second common control test is also not met.

IDEM, OAQ finds that Plant 1 and Plant 2 are not under common control. Since neither common ownership nor common control exists, the first part of the definition of major source is not met.

The SIC Code is determined by looking at the principal product or activity of each source. More information about SIC Codes is available at [https://www.osha.gov/pls/imis/sic\\_manual.html](https://www.osha.gov/pls/imis/sic_manual.html) on the Internet. Both plants have the same two-digit SIC Code 30, for the Major Group 30: Rubber and Miscellaneous Plastic Products. Plant 1 operates under the four-digit SIC Code 3089, Plastics Products, Not Elsewhere Classified. Plant 2 operates under four-digit SIC Code 3082, Unsupported Plastics Profile Shapes.

A plant is a support facility if it sends 50% or more of its output to another plant. Plant 1 does not send any output to Plant 2 and does not receive any output from Plant 2. Plant 1 is not a support facility to Plant 2 nor is Plant 2 a support facility to Plant 1. Since the plants have the same two-digit SIC Code, even though they do not have a support facility relationship, they meet the second part of the definition.

The last criterion of the definition is whether the plants are on the same, contiguous or adjacent properties. Plant 1 and Plant 2 are located on separate properties that share Industry Way, a public road,

as a common boundary. Since they are not on the same property, IDEM, OAQ examined whether the plants are on contiguous or adjacent properties.

The terms “contiguous” and “adjacent” are not defined in Indiana’s rules. IDEM’s Nonrule Policy Document Air-005 is guidance for applying the definition of “major source” in 326 IAC 2-7-1(22). All of IDEM’s nonrule policy documents are available at <http://www.in.gov/idem/4694.htm> on the Internet. IDEM’s NPD Air-005 adds the following guidance:

- Properties that actually abut at any point would satisfy the requirement of contiguous or adjacent property.
- Properties that are separated by a public road or public property would satisfy this requirement, absent special circumstances.
- Other scenarios would be examined on an individual basis with the focus on the distance between the activities and the relationship between the activities.

The two plant properties are separated only by a public road. The road is an easement on the boundary between the two properties. The plants are located on contiguous properties. Therefore, the third part of the major source definition is met.

The plants do not meet all three parts of the major source definition. Therefore, IDEM, OAQ has determined that these plants are not part of the same major source, as defined by 326 IAC 2-7-1(22).

<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) spray booth, identified as SB-1, installed in November 2000, equipped with one (1) manual or robotic HVLP spray gun or an equivalent spray method with higher transfer efficiency, for plastic parts surface coating, with a maximum capacity of 240 units per hour, using water baffles for overspray control, with a flash off area (FO-1), and exhausting to two (2) stacks SPK-1, and SSB-1.
- (b) One (1) spray booth, identified as SB-2, installed in November 2014, equipped with two (2) manual or robotic HVLP spray guns or an equivalent spray method with higher transfer efficiency, for plastic parts surface coating, with a maximum combined capacity of 636 units per hour, using water baffles for overspray control, with a flash off area (FO-2), and exhausting to two (2) stacks SPK-2, and SSB-2.

This spray booth replaces an existing spray booth that was installed in November 2000.

- (c) One (1) spray booth, identified as SB-3, installed in November 2001, equipped with one (1) HVLP spray gun or an equivalent spray method with higher transfer efficiency, for painting plastic parts, with a maximum capacity of 240 units per hour, using a dry filter for overspray control, with a flash off area (FO-3), and exhausting to two (2) stacks SPK-3 and SSB-3.
- (d) One (1) spray booth, identified as SB-4, installed in 2011, equipped with three (3) HVLP spray guns or an equivalent spray method with higher transfer efficiency, for painting plastic parts, with a maximum combined capacity of 240 units per hour, using both a wet booth and dry filters as control, with a flash off area (FO-4), and exhausting to stack SSB-4.

Pursuant to 326 IAC 2-8-3(c)(3)(I) and 326 IAC 2-7-1(21)(E) the curing ovens and injection molding operations and/or each unit have emissions less than insignificant activities. Therefore, the curing ovens and injection molding operations were moved to the insignificant activities listed. This is a new revision.

**Emission Units and Pollution Control Equipment Removed From the Source**

No emission units have been removed since the previous operating permit.

**Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit**

No emission units have been constructed and/or are operating without a permit:

**Insignificant Activities**

The source also consists of the following insignificant activities:

- (a) Natural gas-fired heaters with heat input equal to or less than ten million (10,000,000) British thermal units per hour as follows:
  - (1) Two (2) Omega Radiant Heaters, identified as RH1 and RH2, both installed in January 2007, each with a maximum heat input capacity of 0.40 MMBtu/hr, and all exhausting indoors.
  - (2) One (1) natural gas-fired Lennox Model 30 A Heater, identified as L1, installed in March 2000, with a maximum heat input capacity of 0.24 MMBtu/hr, and exhausting indoors.
  - (3) Four (4) natural gas-fired Air Rotation Units, identified as AR1 through AR4, all installed in March 2000, each with a maximum heat input capacity of 1.25 MMBtu/hr, and all exhausting indoors.
- (b) Natural gas-fired curing ovens with heat input equal to or less than ten million (10,000,000) British thermal units per hour as follows:
  - (1) One (1) natural gas-fired curing oven, identified as CO-1, installed in November 2000, rated at 1.0 million British thermal units (MMBtu) per hour, and exhausting to stack SCO-1.
  - (2) One (1) natural gas-fired curing oven, identified as CO-2, installed in November 2000, rated at 1.0 million British thermal units (MMBtu) per hour, and exhausting to stack SCO-2.
  - (3) One (1) natural gas-fired curing oven, identified as CO-3, installed in November 2001, rated at 0.75 million British thermal units (MMBtu) per hour, used to cure the paint from SB-3, and exhausting to stack SCO-3.
- (c) Forty-nine (49) closed injection molding machines, no control, and all exhausting to the inside of the building including the following:
  - (1) One (1) 40-Ton Injection Molding Machine, identified as D.A. #562, installed in 2000, with a maximum throughput rate of 9.76 pounds of resin per hour.
  - (2) One (1) 40-Ton Injection Molding Machine, identified as D.A. #959, installed in 2002, with a maximum throughput rate of 8.77 pounds of resin per hour.
  - (3) One (1) 40-Ton Injection Molding Machine, identified as D.A. #561, installed in 2000, with a maximum throughput rate of 1.98 pounds of resin per hour.

- (4) One (1) 40-Ton Injection Molding Machine, identified as D.A. #1151, installed in 2004, with a maximum throughput rate of 4.44 pounds of resin per hour.
- (5) One (1) 40-Ton Injection Molding Machine, identified as D.A. #563, installed in 2000, with a maximum throughput rate of 13.73 pounds of resin per hour.
- (6) One (1) 50-Ton Injection Molding Machine, identified as D.A. #2277, installed in 2011, with a maximum throughput rate of 115.0 pounds of resin per hour.
- (7) One (1) 55-Ton Injection Molding Machine, identified as D.A. #2245, installed in 2011, with a maximum throughput rate of 3.74 pounds of resin per hour.
- (8) One (1) 75-Ton Injection Molding Machine, identified as D.A. #578, installed in 2015, with a maximum throughput rate of 9.23 pounds of resin per hour.
- (9) One (1) 75-Ton Injection Molding Machine, identified as D.A. #2006, installed in 2000, with a maximum throughput rate of 10.89 pounds of resin per hour.
- (10) One (1) 75-Ton Injection Molding Machine, identified as D.A. #576, installed in 2000, with a maximum throughput rate of 13.58 pounds of resin per hour.
- (11) One (1) 80-Ton Injection Molding Machine, One (1) identified as D.A. #1007, installed in 2003, with a maximum throughput rate of 5.45 pounds of resin per hour.
- (12) One (1) 85-Ton Injection Molding Machine, identified as D.A. #2242, installed in 2011, with a maximum throughput rate of 4.05 pounds of resin per hour.
- (13) One (1) 85-Ton Injection Molding Machine, identified as D.A. #2244, installed in 2011, with a maximum throughput rate of 59.4 pounds of resin per hour.
- (14) One (1) 90-Ton Injection Molding Machine, identified as D.A. #288, installed in 1994, with a maximum throughput rate of 29.85 pounds of resin per hour.
- (15) One (1) 100-Ton Injection Molding Machine, identified as D.A. #573, installed in 2000, with a maximum throughput rate of 11.87 pounds of resin per hour.
- (16) One (1) 100-Ton Injection Molding Machine, identified as D.A. #962, installed in 2002, with a maximum throughput rate of 16.16 pounds of resin per hour.
- (17) One (1) 100-Ton Injection Molding Machine identified as D.A. #1029, installed in 2004, with a maximum throughput rate of 24.09 pounds of resin per hour.
- (18) One (1) 100-Ton Injection Molding Machine, identified as D.A. #1030, installed in 2004, with a maximum throughput rate of 21.96 pounds of resin per hour.
- (19) One (1) 100-Ton Injection Molding Machine, identified as D.A. #1200, installed in 2004, with a maximum throughput rate of 17.09 pounds of resin per hour.
- (20) One (1) 100-Ton Injection Molding Machine, identified as D.A. #2511, installed in 2013, with a maximum throughput rate of 4.9 pounds of resin per hour.
- (21) One (1) 100-Ton Injection Molding Machine, identified as D.A. #2512, installed in 2013, with a maximum throughput rate of 25 pounds of resin per hour.

- (22) One (1) 160-Ton Injection Molding Machine, identified as D.A. #572, installed in 2000, with a maximum throughput rate of 24.51 pounds of resin per hour.
- (23) One (1) 160-Ton Injection Molding Machine, identified as D.A. #570, installed in 2000, with a maximum throughput rate of 14.27 pounds of resin per hour.
- (24) One (1) 180-Ton Injection Molding Machine, identified as D.A. #305T, installed in 2014, with a maximum throughput rate of 182 pounds of resin per hour.
- (25) One (1) 180-Ton Injection Molding Machine, identified as D.A. #450T, installed in 2014, with a maximum throughput rate of 150 pounds of resin per hour.
- (26) One (1) 180-Ton Injection Molding Machine, identified as D.A. #860T, installed in 2015, with a maximum throughput rate of 60 pounds of resin per hour.
- (27) One (1) 180-Ton Injection Molding Machine, identified as D.A. #2517, installed in 2012, with a maximum throughput rate of 88 pounds of resin per hour.
- (28) One (1) 200-Ton Injection Molding Machine, identified as D.A. #272, installed in 1997, with a maximum throughput rate of 17.65 pounds of resin per hour.
- (29) One (1) 220-Ton Injection Molding Machine, identified as D.A. #1196, installed in 2004, with a maximum throughput rate of 20.96 pounds of resin per hour.
- (30) One (1) 220-Ton Injection Molding Machine, identified as D.A. #1195, installed in 2004, with a maximum throughput rate of 27.21 pounds of resin per hour.
- (31) One (1) 280-Ton Injection Molding Machine, identified as D.A. #569, installed in 2000, with a maximum throughput rate of 29.29 pounds of resin per hour.
- (32) One (1) 280-Ton Injection Molding Machine, identified as D.A. #2518, installed in 2013, with a maximum throughput rate of 16.5 pounds of resin per hour.
- (33) One (1) 350-Ton Injection Molding Machine, identified as D.A. #2278, installed in 2011, with a maximum throughput rate of 115.0 pounds of resin per hour.
- (34) One (1) 350-Ton Injection Molding Machine, identified as D.A. #568, installed in 2000, with a maximum throughput rate of 25.80 pounds of resin per hour.
- (35) One (1) 350-Ton Injection Molding Machine, identified as D.A. #565, installed in 2000, with a maximum throughput rate of 106.23 pounds of resin per hour.
- (36) One (1) 350-Ton Injection Molding Machine, identified as D.A. #368, installed in 2000, with a maximum throughput rate of 20.72 pounds of resin per hour.
- (37) One (1) 350-Ton Injection Molding Machine, identified as D.A. #567, installed in 2000, with a maximum throughput rate of 8.04 pounds of resin per hour.
- (38) One (1) 350-Ton Injection Molding Machine, identified as D.A. #566, installed in 2000, with a maximum throughput rate of 14.90 pounds of resin per hour.
- (39) One (1) 350-Ton Injection Molding Machine, identified as D.A. #564, installed in 2000, with a maximum throughput rate of 114.67 pounds of resin per hour.
- (40) One (1) 350-Ton Injection Molding Machine, identified as D.A. #1013, installed in 2004, with a maximum throughput rate of 61.22 pounds of resin per hour.

- (41) One (1) 350-Ton Injection Molding Machine, identified as D.A. #2035, installed in 2002, transfer machine, with a maximum throughput rate of 59.16 pounds of resin per hour.
- (42) One (1) 350-Ton Injection Molding Machine, identified as D.A. # 2513, installed in 2013, with a maximum throughput rate of 116 pounds of resin per hour.
- (43) One (1) 350-Ton Injection Molding Machine, identified as D.A. # 2514, installed in 2013, with a maximum throughput rate of 116 pounds of resin per hour.
- (44) One (1) 350-Ton Injection Molding Machine, identified as D.A. # 2515, installed in 2013, with a maximum throughput rate of 36 pounds of resin per hour.
- (45) One (1) 390-Ton Injection Molding Machine, identified as D.A. #2099, installed in 2008, with a maximum throughput rate of 12.49 pounds of resin per hour.
- (46) One (1) 450-Ton Injection Molding Machine, identified as D.A. #1372, installed in 2005, with a maximum throughput rate of 56.80 pounds of resin per hour.
- (47) One (1) 450-Ton Injection Molding Machine, identified as D.A. #2282, installed in 2011, with a maximum throughput rate of 59.56 pounds of resin per hour.
- (48) One (1) 550-Ton Injection Molding Machine, identified as D.A. #668, installed in 2000, with a maximum throughput rate of 41.50 pounds of resin per hour.
- (49) One 55-Ton Injection Molding Machine, identified as D.A. #2348, installed in 2012, with a maximum throughput rate of 77.19 pounds of resin per hour.

(d) Paved roads and paved parking lots with public access. [326 IAC 6-4]

Pursuant to 326 IAC 2-8-3(c)(3)(I) and 326 IAC 2-7-1(21)(E) the curing ovens combined and each unit have emissions less than insignificant activities and the injection molding operations combined and each unit have emissions less than insignificant activities. Therefore, the curing oven and injection molding operations were moved to the insignificant activities listed. This is a new revision.

There are no new or removed emission unit since the last operating permit was issued.

<b>Existing Approvals</b>
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The source was issued FESOP No. 019-30695-00103 on December 19, 2011. The source has since received the following approvals:

- (a) Administrative Amendment No. 019-31519-00103, issued on April 4, 2012;
- (b) Administrative Amendment No. 019-32401-00103, issued on November 28, 2012;
- (c) Administrative Amendment No. 019-32801-00103, issued on February 25, 2013;
- (d) Administrative Amendment No. 019-33010-00103, issued on April 11, 2013; and
- (e) Significant Permit Revision No. 019-34555-00103, issued on August 1, 2014.

### Emission Calculations

See Appendix A of this document for detailed emission calculations.

### County Attainment Status

The source is located in Clark County.

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

<sup>1</sup>Attainment effective October 23, 2001, for the 1-hour ozone standard for the Louisville area, including Clark County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standard (NAAQS) for purposes of 40 CFR Part 51, Subpart X\*. The 1-hour standard 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. Clark 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>**  
Clark County has been classified as nonattainment for PM<sub>2.5</sub> in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5.
- (c) **Other Criteria Pollutants**  
Clark County has been classified as attainment or unclassifiable in Indiana for SO<sub>2</sub>, CO, PM<sub>10</sub>, NO<sub>2</sub>, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Fugitive Emissions

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

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	33.85
PM <sub>10</sub>	33.81
PM <sub>2.5</sub>	33.76
SO <sub>2</sub>	0.02
NO <sub>x</sub>	3.77
VOC	141.41
CO	3.18
Single HAP	5.71 HDI
Total HAP	7.09

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

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

**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
Spray Booths (SB-1, SB-2, SB-3 and SB-4)	33.14	33.14	33.14	-	-	98.71 (a)	-	6.50	5.71 HDI
Natural Gas Combustion Heaters (RH1, RH2, L1, AR1 through AR4)	0.05	0.20	0.20	0.02	2.59	0.14	2.18	0.05	0.05 Hexane
Natural Gas Curing Ovens (CO-1, CO-2 and CO-3)	0.02	0.09	0.09	0.01	1.18	0.06	0.99	0.02	0.02 Hexane
Injection Molding Machines	0.31	0.31	0.31	-	0.00	0.98	0.01	0.52	0.39 Styrene
Paved Roads	0.32	0.06	0.02	-	-	-	-	-	-
<b>Total PTE of Entire Source</b>	<b>33.85</b>	<b>33.81</b>	<b>33.76</b>	<b>0.02</b>	<b>3.77</b>	<b>99.90</b>	<b>3.18</b>	<b>7.09</b>	<b>5.71 HDI</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), PM <sub>10</sub> and PM <sub>2.5</sub> , 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> . (a) Limited VOC to render 326 IAC 2-7 not applicable.									

Pursuant to 326 IAC 2-8-4, the VOC input (including dilution and cleaning solvents) to spray booths SB-1, SB-2, SB-3 and SB-4 combined shall be less than 98.71 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

This is an existing limit and no change has been made in this renewal.

- (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) These emissions are based upon Appendix A of this TSD.
- (c) 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).

- (d) 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.

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

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

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Surface Coating at Area Sources, 40 CFR 63.1116, Subpart HHHHHH (6H), are not included in the permit, since the source does not use chemical strippers containing methylene chloride, does not perform spray application of coatings, as defined in §63.11180, to motor vehicles and mobile equipment, and does not perform spray application of coatings that contain the target HAP, as defined in §63.11180, to a plastic and/or metal substrate on a part or product.
- (d) 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.

### **State Rule Applicability - Entire Source**

326 IAC 1-6-3 (Preventive Maintenance Plan)  
The source is subject to 326 IAC 1-6-3.

326 IAC 2-6 (Emission Reporting)  
This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is 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(1).

**326 IAC 6-4 (Fugitive Dust Emissions Limitations)**

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

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

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

<b>State Rule Applicability – Individual Facilities</b>
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**326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**

The operation of each emission unit will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply to any of the emission units at the source.

**Spray Booths SB-1, SB-2, SB-3 and SB-4**

**326 IAC 6.5 (Particulate Matter Limitations Except Lake County)**

Pursuant to 326 IAC 6.5-1-2(h), the spray booths shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the source shall operate the control device in accordance with manufacturer's specifications.

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

Spray booths are subject to a particulate matter limitation specified in 326 IAC 6.5 that is as stringent as or more stringent than the particulate limitation established in 326 IAC 6-3.

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

The unlimited VOC potential emissions from spray booths SB-1, SB-2, SB-3, and SB-4 are each greater than twenty-five (25) tons per year and are not regulated by another article 8 rule. However, the source will continue to limit the VOC emissions from each unit SB-1, SB-2, SB-3, and SB-4 to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

In order to render the requirements of 326 IAC 8-1-6 not applicable, the Permittee shall comply with the following:

- (1) The volatile organic compounds (VOC) input (including dilution and cleaning solvents) to the spray booth, identified as SB-1, shall be less than twenty-five (25) tons per year per twelve (12) consecutive month period each, with compliance determined at the end of each month.
- (2) The volatile organic compounds (VOC) input (including dilution and cleaning solvents) to the spray booth, identified as SB-2, shall be less than twenty-five (25) tons per year per twelve (12) consecutive month period each, with compliance determined at the end of each month.
- (3) The volatile organic compounds (VOC) input (including dilution and cleaning solvents) to the spray booth, identified as SB-3, shall be less than twenty-five (25) tons per year per twelve (12) consecutive month period each, with compliance determined at the end of each month.

- (4) The volatile organic compounds (VOC) input (including dilution and cleaning solvents) to the spray booth, identified as SB-4, shall be less than twenty-five (25) tons per year per twelve (12) consecutive month period each, with compliance determined at the end of each month.

These are existing limits and no change has been made in this renewal.

Compliance with the above limits shall limit the potential to emit VOC from the spray booths SB-1, SB-2, SB-3, and SB-4, each to less than twenty-five (25) tons per 12 consecutive month period and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

326 IAC 8-2-2 (Automobile and light duty truck coating operations)

This source does not coat automobiles and light duty trucks. Therefore, the requirements of 326 IAC 8-2-2 do not apply to this source.

326 IAC 8-2-7 (Large appliance coating operations)

This source does not coat large appliances. Therefore, the requirements of 326 IAC 8-2-7 do not apply to this source.

326 IAC 8-2-9 (Miscellaneous metal and plastic coating operations)

This source does not coat metal. The source coats plastics, however it is not located in Lake County or Porter County. Therefore, this source which performs plastic surface coating is not subject to 326 IAC 8-2-9.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

This source is located in Clark County and the potential VOC emissions from the four (4) spray booths are each greater than ten (10) tons per year. However, these facilities are exempt as defined in 326 IAC 8-7-2(a)(3)(K) because the emissions are from plastic parts coating for automobiles. Therefore, 326 IAC 8-7 does not apply.

Natural Gas Combustion Heaters RH1, RH2, L1, AR1 through AR4

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

The source is located in Clark County but is not specifically identified in 326 IAC 6.5-2. Pursuant to 326 IAC 6.5-1-1(a)(2), even though the PM PTE is less than 100 tons per year, the source could potentially emit greater than ten (10) tons per year of particulate. Therefore, Pursuant to 326 IAC 6.5-1-2(a), particulate limitations from each emission unit shall not exceed 0.03 grain per dry standard cubic foot.

This is a new requirement

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

Pursuant to 326 IAC 1-2-59(a), liquid and gaseous fuels and combustion air will not be considered as part of the process weight. Therefore, the direct natural gas-fired combustion sources, identified as RH1, RH2, L1, and AR1 through AR4, are all exempt from this rule.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

Each emission unit is not subject to 326 IAC 326 IAC 7-1.1 because the SO<sub>2</sub> PTE (or limited SO<sub>2</sub> PTE) for each emission unit is less than 25 tons/year or 10 pounds/hour.

Natural Gas Curing Ovens CO-1, CO-2 and CO-3

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

The source is located in Clark County but is not specifically identified in 326 IAC 6.5-2. Pursuant to 326 IAC 6.5-1-1(a)(2), even though the PM PTE is less than 100 tons per year, the source

could potentially emit greater than ten (10) tons per year of particulate. Therefore, Pursuant to 326 IAC 6.5-1-2(a), particulate limitations from each emission unit shall not exceed 0.03 grain per dry standard cubic foot.

This is a new requirement

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

Pursuant to 326 IAC 1-2-59(a), liquid and gaseous fuels and combustion air will not be considered as part of the process weight. Therefore, the direct natural gas-fired combustion units, identified as CO-1, CO-2, and CO-3, are all exempt 326 IAC 6-3.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

Each emission unit is not subject to 326 IAC 326 IAC 7-1.1 because the SO<sub>2</sub> PTE (or limited SO<sub>2</sub> PTE) for each emission unit is less than 25 tons/year or 10 pounds/hour.

Injection Molding Machines

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

The source is located in Clark County but is not specifically identified in 326 IAC 6.5-2. Pursuant to 326 IAC 6.5-1-1(a)(2), even though the PM PTE is less than 100 tons per year, the source could potentially emit greater than ten (10) tons per year of particulate. Therefore, the source is subject to the requirements of 326 IAC 6.5. Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from the injection molding machines shall each not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

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

The injection molding machines each have potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), injection molding machines, are all exempt 326 IAC 6-3.

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

Each injection molding machine is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each injection molding machine is less than twenty-five (25) tons per year.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

This source is located in Clark County. However, each injection molding machine is not subject to the requirements of 326 IAC 8-7, since the unlimited VOC potential emissions from each injection molding machine is less than ten (10) tons per year.

**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.

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

<b>Emission Unit/Control</b>	<b>Operating Parameters</b>	<b>Frequency</b>	<b>Excursions and Exceedances</b>
SB-1	Inspections of the water level of the pans	Daily	Response Steps
	Water level maintenance of the pans	Weekly	Response Steps
	Baffles inspections	Weekly	Response Steps
	Overspray observations	Weekly	Response Steps
	Stack Exhausts observations	Monthly	Response Steps
SB-2	Inspections of the water level of the pans	Daily	Response Steps
	Water level maintenance of the pans	Weekly	Response Steps
	Baffles inspections	Weekly	Response Steps
	Overspray observations	Weekly	Response Steps
	Stack Exhausts observations	Monthly	Response Steps
SB-3	Inspections - filter checks	Daily	Response Steps
	Overspray observations	Weekly	Response Steps
	Stack Exhausts observations	Monthly	Response Steps
SB-4	Inspections - filter checks	Daily	Response Steps
	Overspray observations	Weekly	Response Steps
	Stack Exhausts observations	Monthly	Response Steps

These monitoring conditions are necessary to ensure compliance with 326 IAC 6.5-1-2(h).

The daily inspections of the water level and weekly inspections and maintenance of the water pan of the baffles are new monitoring requirements.

<b>Emission Unit/Control</b>	<b>Operating Parameters</b>	<b>Frequency</b>
SB-1	Record Keeping and Reporting (VOC content)	Monthly
SB-2		
SB-3		
SB-4		

These monitoring conditions are necessary because the VOC input and content must be verified in order to ensure compliance with 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 and 326 IAC 8-1-6 not applicable

Testing is not required for this source.

### 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 December 8, 2015.

### Conclusion

The operation of this plastic injection molded parts and surface coating operation shall be subject to the conditions of the attached FESOP Renewal No. F019-36571-00103.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Monica Dick at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 324-1243 or toll free at 1-800-451-6027 extension 4-1243.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations  
Source-wide Summary**

Company Name: K & M Indiana LLC dba Mitchell Plastics  
Address City IN Zip: 301 Pike Street, Charlestown, Indiana 47111  
Permit Number: F019-36571-00103  
Reviewer: Monica Dick

Uncontrolled/Unlimited PTE (tons/year)										
Emission Unit	PM (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Total HAP (tons/yr)	Single HAP (tons/yr)	
Spray Booths (SB-1, SB-2, SB-3 and SB-4)*	33.14	33.14	33.14	-	-	140.22	-	6.50	5.71	HDI
Natural Gas Combustion Heaters (RH1, RH2, L1, AR1 through AR4)	0.05	0.20	0.20	0.02	2.59	0.14	2.18	0.05	0.05	Hexane
Natural Gas Curing Ovens (CO-1, CO-2 and CO-3)	0.02	0.09	0.09	0.01	1.18	0.06	0.99	0.02	0.02	Hexane
Injection Molding Machines	0.31	0.31	0.31	-	0.00	0.98	0.01	0.52	0.39	Styrene
Paved Roads	0.32	0.06	0.02	-	-	-	-	-	-	
<b>Total :</b>	<b>33.85</b>	<b>33.81</b>	<b>33.76</b>	<b>0.02</b>	<b>3.77</b>	<b>141.41</b>	<b>3.18</b>	<b>7.09</b>	<b>5.71</b>	<b>HDI</b>

- = negligible

\* VOC from the spray booths is from 2 parts solution

Limited PTE (tons/year)										
Emission Unit	PM (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	<sup>1</sup> VOC (tons/yr)	CO (tons/yr)	Total HAP (tons/yr)	Single HAP (tons/yr)	
Spray Booths (SB-1, SB-2, SB-3 and SB-4)	33.14	33.14	33.14	-	-	98.71	-	6.50	5.71	HDI
Natural Gas Combustion Heaters (RH1, RH2, L1, AR1 through AR4)	0.05	0.20	0.20	0.02	2.59	0.14	2.18	0.05	0.05	Hexane
Natural Gas Curing Ovens (CO-1, CO-2 and CO-3)	0.02	0.09	0.09	0.01	1.18	0.06	0.99	0.02	0.02	Hexane
Injection Molding Machines	0.31	0.31	0.31	-	0.00	0.98	0.01	0.52	0.39	Styrene
Paved Roads	0.32	0.06	0.02	-	-	-	-	-	-	
<b>Total :</b>	<b>33.85</b>	<b>33.81</b>	<b>33.76</b>	<b>0.02</b>	<b>3.77</b>	<b>99.90</b>	<b>3.18</b>	<b>7.09</b>	<b>5.71</b>	<b>HDI</b>

- = negligible

Note 1: In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7, the Permittee shall comply with the following:

The VOC input to spray booths SB-1, SB-2, SB-3 and SB-4 combined shall be less than 98.71 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC from the entire source to less than 100 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-7 not applicable.

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name: K & M Indiana LLC dba Mitchell Plastics  
Address City IN Zip: 301 Pike Street, Charlestown, Indiana 47111  
Permit Number: F019-36571-00103  
Reviewer: Monica Dick**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency		
SB-1	8.94	75.75%	52.02%	23.73%	55.83%	24.25%	0.0118	240	4.80	2.12	6.01	144.19	26.31	9.41	8.75	65%		
Solvent	6.55	100.0%	0.0%	100.0%	0.0%	0.00%	0.02974	1.000	6.55	6.55	0.19	4.68	0.85	0.00	N/A	0%		
													<b>27.17</b>	<b>9.41</b>				
<b><sup>1</sup>SB-2 Mix Ratio</b>							Gal of Mat. (gal/unit) of Mix	Gal of Mat. (gal/unit) per Component										
Basecoat	6	7.98	70.81%	0.0%	70.8%	0.0%	23.12%	0.00303	0.00165	636	5.65	5.65	5.94	142.55	26.02	3.75	24.44	65%
Thinner	4	6.9	100.00%	0.0%	100.0%	0.0%	0.00%	0.00303	0.00110	636	6.90	6.90	4.84	116.05	21.18	0.00	N/A	0%
Urethane Hardener	1	8.100	N/A	0.0%	N/A	0.0%	35.00%	0.00303	0.00028	636	4.77	4.77	0.84	20.06	2.18	2.18	N/A	65%
													<b>11</b>	<b>50.85</b>	<b>5.93</b>			
<b><sup>1</sup>SB-3 Mix Ratio</b>							Gal of Mat. (gal/unit) of Mix	Gal of Mat. (gal/unit) per Component										
Basecoat (Silver 11SV18)	5.6	8.11	66.21%	0.00%	66.21%	0.00%	26.62%	0.005	0.0026	240	5.37	5.37	3.34	80.19	14.63	5.83	20.17	22%
Thinner (SV4380)	4.2	6.92	100.00%	0.00%	100.00%	0.00%	0.00%	0.005	0.0019	240	6.92	6.92	3.23	77.50	14.14	0.00	N/A	0%
<sup>2</sup> Urethane Hardener	1	8.10	N/A	0.00%	N/A	0.00%	35.00%	0.005	0.0005	240	4.77	4.77	0.53	12.71	2.32	3.07	N/A	22%
													<b>10.8</b>	<b>31.10</b>	<b>8.90</b>			
<b><sup>1</sup>SB-4 Mix Ratio</b>							Gal of Mat. (gal/unit) of Mix	Gal of Mat. (gal/unit) per Component										
Basecoat (Silver 11SV18)	5.6	8.11	66.21%	0.00%	66.21%	0.00%	26.62%	0.005	0.0026	240	5.37	5.37	3.34	80.19	14.63	5.83	20.17	22%
Thinner (SV4380)	4.2	6.92	100.00%	0.00%	100.00%	0.00%	0.00%	0.005	0.0019	240	6.92	6.92	3.23	77.50	14.14	0.00	N/A	0%
<sup>2</sup> Urethane Hardener	1	8.10	N/A	0.00%	N/A	0.00%	35.00%	0.005	0.0005	240	4.77	4.77	0.53	12.71	2.32	3.07	N/A	22%
													<b>10.8</b>	<b>31.10</b>	<b>8.90</b>			

Note 1: For the mixture used in SB-2, SB-3 and SB-4, the gallons per unit of the mixture was converted to gallon per unit of each component based on the Mix Ratio. The gallons per unit of each component was used to calculate the PTE as shown in the Methodology.

Note 2: This information shown as N/A is not listed on the MSDS sheet, therefore not used in the calculation, however, the MSDS sheet does list the VOC content of the hardener as 4.768 lbs/gal which is used in these calculations.

**Potential Emissions** **Add worst case coating to all solvents**

<b>Total PTE (tons/yr)</b>	Potential VOC tons per year	Particulate Potential (ton/yr)
	<b>140.22</b>	<b>33.14</b>
Total Controlled PTE (tons/yr)*:	140.22	6.63

\*Dry Filter Particulate Control Efficiency is 80%

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
 Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hrs/yr) \* (1 ton/2000 lbs)  
 Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1-Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)  
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
 Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations  
HAP Emission Calculations**

**Company Name: K & M Indiana LLC dba Mitchell Plastics  
Address City IN Zip: 301 Pike Street, Charlestown, Indiana 47111  
Permit Number: F019-36571-00103  
Reviewer: Monica Dick**

Material	Mix Ratio	Density (Lb/Gal)	Gallons of Material (gal/unit)	Gal of Mat. (gal/unit) per Component	Maximum (unit/hour)	Weight % Xylene	Weight % Hexamethylene diisocyanate (HDI)	Weight % Benzene	Xylene Emissions (ton/yr)	Hexamethylene diisocyanate (HDI) Emissions (ton/yr)	Benzene Emissions (ton/yr)
<b><sup>1</sup>SB-2</b>											
Basecoat	6	7.98	0.00303	0.00165	636	0.00%	0.00%	0.00%	0.00	0.00	0.00
Thinner	4	6.9	0.00303	0.00110	636	0.00%	0.00%	0.00%	0.00	0.00	0.00
Urethane Hardener	1	8.1	0.00303	0.00028	636	5.60%	40.50%	0.00%	0.35	2.52	0.00
									<b>0.35</b>	<b>2.52</b>	<b>0.00</b>

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Material	Mix Ratio	Density (Lb/Gal)	Gallons of Material (gal/unit)	Gal of Mat. (gal/unit) per Component	Maximum (unit/hour)	Weight % Xylene	Weight % Hexamethylene diisocyanate (HDI)	Weight % Benzene	Xylene Emissions (ton/yr)	Hexamethylene diisocyanate (HDI) Emissions (ton/yr)	Benzene Emissions (ton/yr)
<b><sup>1</sup>SB-3</b>											
Basecoat (Silver 11SV18)	5.6	8.11	0.005	0.0026	240	0.00%	0.00%	0.00%	0.00	0.00	0.00
Thinner (SV4380)	4.2	6.92	0.005	0.0019	240	0.00%	0.00%	0.00%	0.00	0.00	0.00
<sup>2</sup> Urethane Hardener	1	8.10	0.005	0.0005	240	5.60%	40.50%	0.00%	0.22	1.60	0.00
									<b>0.22</b>	<b>1.60</b>	<b>0.00</b>

10.8

Material	Mix Ratio	Density (Lb/Gal)	Gallons of Material (gal/unit)	Gal of Mat. (gal/unit) per Component	Maximum (unit/hour)	Weight % Xylene	Weight % Hexamethylene diisocyanate (HDI)	Weight % Benzene	Xylene Emissions (ton/yr)	Hexamethylene diisocyanate (HDI) Emissions (ton/yr)	Benzene Emissions (ton/yr)
<b><sup>1</sup>SB-4</b>											
Basecoat (Silver 11SV18)	5.6	8.11	0.005	0.0026	240	0.00%	0.00%	0.00%	0.00	0.00	0.00
Thinner (SV4380)	4.2	6.92	0.005	0.0019	240	0.00%	0.00%	0.00%	0.00	0.00	0.00
<sup>2</sup> Urethane Hardener	1	8.10	0.005	0.0005	240	5.60%	40.50%	0.00%	0.22	1.60	0.00
									<b>0.22</b>	<b>1.60</b>	<b>0.00</b>

10.8

Total Single HAP Potential Emissions (tons/yr)	<b>0.790</b>	<b>5.710</b>	<b>0.000</b>
Total Combined HAP Potential Emissions (tons/yr)	<b>6.500</b>		

SB - 1 uses non-HAP products only.

Note 1: For the mixture used in SB-2, SB-3 and SB-4, the gallons per unit of the mixture was converted to gallon per unit of each component based on the Mix Ratio. The gallons per unit of each component was used to calculate the PTE as shown in the Methodology.

Note 2: The weight % volatile and weight % water were not listed on the MSDS sheet. The MSDS sheet does list the VOC as 4.768 lbs/gal which is used in these calculations.

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

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

**Heaters (RH1, RH2, L1, AR1 through AR4)**

**Company Name:** K & M Indiana LLC dba Mitchell Plastics  
**Address City IN Zip:** 301 Pike Street, Charlestown, Indiana 47111  
**Permit Number:** F019-36571-00103  
**Reviewer:** Monica Dick

Heat Input Capacity MMBtu/hr	HHV MMBtu MMscf	Potential Throughput MMCF/yr
6.04	1020	51.9

Total for all natural gas-fired  
emission units

Unit description	Unit number	MMBtu/hr
Radiant Heater	RH1	0.40
Radiant Heater	RH2	0.40
Lennox Heater	L1	0.24
Air Rotation Unit	AR1	1.25
Air Rotation Unit	AR2	1.25
Air Rotation Unit	AR3	1.25
Air Rotation Unit	AR4	1.25
<b>Total</b>	all units	6.04

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	PM2.5	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.05	0.20	0.20	0.02	2.59	0.14	2.18

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 is assumed to be equal to PM10.

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	0.00	0.00	0.00	0.05	0.00

Emission Factor in lb/MMcf	HAPs - Metals					
	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	<b>Total</b>
Potential Emission in tons/yr	0.00	0.00	0.00	0.00	0.00	<b>0.05</b>

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

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

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

**Curing Ovens (CO-1, CO-2 and CO-3)**

**Company Name: K & M Indiana LLC dba Mitchell Plastics  
Address City IN Zip: 301 Pike Street, Charlestown, Indiana 47111  
Permit Number: F019-36571-00103  
Reviewer: Monica Dick**

Heat Input Capacity MMBtu/hr	HHV MMBtu MMscf	Potential Throughput MMCF/yr
2.75	1020	23.6

Total for all natural gas-fired  
emission units

Unit description	Unit number	MMBtu/hr
Cure Oven	CO-1	1.00
Cure Oven	CO-2	1.00
Cure Oven	CO-3	0.75
Total	all units	2.75

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	PM2.5	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.02	0.09	0.09	0.01	1.18	0.06	0.99

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 is assumed to be equal to PM10.

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Ga

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

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

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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	0.00	0.00	0.00	0.02	0.00

Emission Factor in lb/MMcf	HAPs - Metals					Total
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	0.00	0.00	0.00	0.00	0.00	<b>0.02</b>

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

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

**Appendix A: Emissions Calculations**  
**Potential to Emit Criteria Air Pollutants from the Injection Molding Machines**  
**Processing Polypropylene with a 505 °F Melt Temperature**

Company Name: K & M Indiana LLC dba Mitchell Plastics  
Address City IN Zip: 301 Pike Street, Charlestown, Indiana 47111  
Permit Number: F019-36571-00103  
Reviewer: Monica Dick

D.A. #	Resin Type	Max Throughput Rate (lbs resin/hr)	PM			VOC			<sup>(3)</sup> CO			<sup>(3)</sup> NOx		
			Emission Factor (lbs/10 <sup>6</sup> lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lbs/10 <sup>6</sup> lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lbs/10 <sup>6</sup> lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lbs/10 <sup>6</sup> lbs)	Emissions (lbs/hr)	Emissions (tons/yr)
562	<sup>(1)</sup> POM	9.76	34.5	0.00	0.00	80.3	0.00	0.00	1.00	0.00	0.00	0.04	0.00	0.00
959	<sup>(1)</sup> PP	8.77	34.5	0.00	0.00	80.3	0.00	0.00	1.00	0.00	0.00	0.04	0.00	0.00
561	<sup>(1)</sup> PP	1.98	34.5	0.00	0.00	80.3	0.00	0.00	1.00	0.00	0.00	0.04	0.00	0.00
1151	<sup>(1)</sup> PP	4.44	34.5	0.00	0.00	80.3	0.00	0.00	1.00	0.00	0.00	0.04	0.00	0.00
563	<sup>(1)</sup> PBT	13.73	34.5	0.00	0.00	80.3	0.00	0.00	1.00	0.00	0.00	0.04	0.00	0.00
2277	<sup>(1)(4)</sup> PP	115.00	34.5	0.00	0.02	80.3	0.01	0.04	1.00	0.00	0.00	0.04	0.00	0.00
2245	<sup>(2)</sup> ABS	3.74	34.5	0.00	0.00	199	0.00	0.00	1.00	0.00	0.00	0.04	0.00	0.00
578	<sup>(1)</sup> POM	9.23	34.5	0.00	0.00	80.3	0.00	0.00	1.00	0.00	0.00	0.04	0.00	0.00
2006	<sup>(3)</sup> PA6/GF30	10.89	24	0.00	0.00	65	0.00	0.00	1.00	0.00	0.00	0.04	0.00	0.00
576	<sup>(2)</sup> ABS	13.58	34.5	0.00	0.00	199	0.00	0.01	1.00	0.00	0.00	0.04	0.00	0.00
1007	<sup>(1)</sup> PP	5.45	34.5	0.00	0.00	80.3	0.00	0.00	1.00	0.00	0.00	0.04	0.00	0.00
2242	<sup>(1)</sup> PP/GF10	4.05	34.5	0.00	0.00	80.3	0.00	0.00	1.00	0.00	0.00	0.04	0.00	0.00
2244	<sup>(1)</sup> PP/GF10	59.40	34.5	0.00	0.01	80.3	0.00	0.02	1.00	0.00	0.00	0.04	0.00	0.00
288	<sup>(1)</sup> POM	29.85	34.5	0.00	0.00	80.3	0.00	0.01	1.00	0.00	0.00	0.04	0.00	0.00
573	<sup>(2)</sup> ABS	11.87	34.5	0.00	0.00	199	0.00	0.01	1.00	0.00	0.00	0.04	0.00	0.00
962	<sup>(3)</sup> PA6/GF30	16.16	24	0.00	0.00	65	0.00	0.00	1.00	0.00	0.00	0.04	0.00	0.00
1029	<sup>(1)</sup> PP	24.09	34.5	0.00	0.00	80.3	0.00	0.01	1.00	0.00	0.00	0.04	0.00	0.00
1030	<sup>(1)</sup> PP	21.96	34.5	0.00	0.00	80.3	0.00	0.01	1.00	0.00	0.00	0.04	0.00	0.00
1200	<sup>(1)</sup> PBT	17.09	34.5	0.00	0.00	80.3	0.00	0.01	1.00	0.00	0.00	0.04	0.00	0.00
2511	<sup>(1)</sup> PP	4.90	34.5	0.00	0.00	199	0.00	0.00	1.00	0.00	0.00	0.04	0.00	0.00
2512	<sup>(2)</sup> ABS	25.00	34.5	0.00	0.00	199	0.00	0.02	1.00	0.00	0.00	0.04	0.00	0.00
572	<sup>(2)</sup> ABS	24.51	34.5	0.00	0.00	199	0.00	0.02	1.00	0.00	0.00	0.04	0.00	0.00
570	<sup>(3)</sup> PBT	14.27	34.5	0.00	0.00	80.3	0.00	0.01	1.00	0.00	0.00	0.04	0.00	0.00
305T	<sup>(2)</sup> ABS	182.00	34.5	0.01	0.03	199	0.04	0.16	1.00	0.00	0.00	0.04	0.00	0.00
450T	<sup>(1)</sup> PP	150.00	34.5	0.01	0.02	80.3	0.01	0.05	1.00	0.00	0.00	0.04	0.00	0.00
860T	<sup>(1)</sup> PP	60.00	34.5	0.00	0.01	80.3	0.00	0.02	1.00	0.00	0.00	0.04	0.00	0.00
2517	<sup>(1)</sup> PP	88.00	34.5	0.00	0.01	80.3	0.01	0.03	1.00	0.00	0.00	0.04	0.00	0.00
272	<sup>(1)</sup> PP	17.65	34.5	0.00	0.00	80.3	0.00	0.01	1.00	0.00	0.00	0.04	0.00	0.00
1196	<sup>(1)</sup> PP	20.96	34.5	0.00	0.00	80.3	0.00	0.01	1.00	0.00	0.00	0.04	0.00	0.00
1195	<sup>(1)</sup> PP	27.21	34.5	0.00	0.00	80.3	0.00	0.01	1.00	0.00	0.00	0.04	0.00	0.00
569	<sup>(1)</sup> PP	29.29	34.5	0.00	0.00	80.3	0.00	0.01	1.00	0.00	0.00	0.04	0.00	0.00
2518	<sup>(1)</sup> PP	16.50	34.5	0.00	0.00	80.3	0.00	0.01	1.00	0.00	0.00	0.04	0.00	0.00
2278	<sup>(1)(4)</sup> PP	115.00	34.5	0.00	0.02	80.3	0.01	0.04	1.00	0.00	0.00	0.04	0.00	0.00
568	<sup>(1)</sup> PP	25.80	34.5	0.00	0.00	80.3	0.00	0.01	1.00	0.00	0.00	0.04	0.00	0.00
565	<sup>(1)</sup> PP	106.23	34.5	0.00	0.02	80.3	0.01	0.04	1.00	0.00	0.00	0.04	0.00	0.00
368	<sup>(1)</sup> PP	20.72	34.5	0.00	0.00	80.3	0.00	0.01	1.00	0.00	0.00	0.04	0.00	0.00
567	<sup>(1)</sup> PP	8.04	34.5	0.00	0.00	80.3	0.00	0.00	1.00	0.00	0.00	0.04	0.00	0.00
566	<sup>(1)</sup> PP	14.90	34.5	0.00	0.00	80.3	0.00	0.01	1.00	0.00	0.00	0.04	0.00	0.00
564	<sup>(2)</sup> PC/ABS	114.67	34.5	0.00	0.02	199	0.02	0.10	1.00	0.00	0.00	0.04	0.00	0.00
1013	<sup>(1)</sup> PP	61.22	34.5	0.00	0.01	80.3	0.00	0.02	1.00	0.00	0.00	0.04	0.00	0.00
2035	<sup>(2)</sup> ABS	59.16	34.5	0.00	0.01	199	0.01	0.05	1.00	0.00	0.00	0.04	0.00	0.00
2513	<sup>(1)</sup> PP	116.00	34.5	0.00	0.02	80.3	0.01	0.04	1.00	0.00	0.00	0.04	0.00	0.00
2514	<sup>(1)</sup> PP	116.00	34.5	0.00	0.02	80.3	0.01	0.04	1.00	0.00	0.00	0.04	0.00	0.00
2515	<sup>(1)</sup> PP	36.00	34.5	0.00	0.01	199	0.01	0.03	1.00	0.00	0.00	0.04	0.00	0.00
2099	<sup>(2)</sup> ABS	12.49	34.5	0.00	0.00	199	0.00	0.01	1.00	0.00	0.00	0.04	0.00	0.00
1372	<sup>(1)</sup> PP	56.80	34.5	0.00	0.01	80.3	0.00	0.02	1.00	0.00	0.00	0.04	0.00	0.00
2282	<sup>(1)</sup> PP	59.56	34.5	0.00	0.01	80.3	0.00	0.02	1.00	0.00	0.00	0.04	0.00	0.00
668	<sup>(1)</sup> PP	41.50	34.5	0.00	0.01	80.3	0.00	0.01	1.00	0.00	0.00	0.04	0.00	0.00
2348	<sup>(1)</sup> PP	77.19	34.5	0.00	0.01	80.3	0.01	0.03	1.00	0.00	0.00	0.04	0.00	0.00
<b>Totals:</b>				<b>0.07</b>	<b>0.31</b>		<b>0.22</b>	<b>0.98</b>		<b>0.00</b>	<b>0.01</b>		<b>0.00</b>	<b>0.00</b>

**Methodology**

Emissions (lbs/hr) = Max Throughput Rate (lbs resin/hr) \* Emission Factor (lbs/10<sup>6</sup> lbs) / 1,000,000  
Emissions (tons/yr) = Emissions (lbs/hr) \* 8760 (hrs/yr) / 2000 (lbs/ton)

**Notes**

These resin type and maximum throughput were submitted by the source.

The emission factors above were taken from technical papers described below in notes 1 through 6. This methodology and the emission factors were used in Registration No. 005-28577-00102, issued on January 21, 2010.

<sup>(1)</sup>The emission factors for PM & VOC from Polypropylene molding were taken from a technical paper, volume 49, published in January 1999, 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 from Table 5. The emission factors for PP were used for the PE resins.

<sup>(2)</sup>The polypropylene emission factor for PM was used for ABS and PC/ABS Resins. The emission factor for VOC emissions for ABS and PC/ABS Resins comes from the technical paper, "Sampling and Analysis of Volatile Organic Compounds Evolved During Thermal Processing of Acrylonitrile Butadiene Styrene Composite Resins", from volume 45, published in September 1995 of the Journal of Air and Waste Management Association. The Auto VOC emission factor from Table 4 was used.

<sup>(3)</sup>Emission factors for PM, VOC CO and NOx from polyamide processing were taken from the technical paper, "Development of Emission Factors for Polyamide Processing", from Volume 51, published in July 2001 of the Journal of Air and Waste Management Association. General PA6 Low Caprolactam was used from Table 3. The CO and NOx emission factors were used for all resin types.

<sup>(4)</sup>In order to be conservative, a maximum throughput rate of 115 pounds of resin per hour with ABS as the resin was used to calculate the worse case PTE.

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

Company Name: K & M Indiana LLC dba Mitchell Plastics  
 Address City IN Zip: 301 Pike Street, Charlestown, Indiana 47111  
 Permit Number: F019-36571-00103  
 Reviewer: Monica Dick

**HAP Emission Factors from Processing Polypropylene**

HAP Constituent	CAS #	<sup>(1)</sup> Emission Factor (lbs/10 <sup>6</sup> lbs)
Acetaldehyde	75-07-0	0.20
Acrolein	107-02-8	0.01
Formaldehyde	50-00-0	0.18
Propionaldehyde	123-38-6	0.95
Acrylic acid	79-10-7	0.08

**HAP Emission Factors from Processing ABS**

HAP Constituent	CAS #	<sup>(2)</sup> Emission Factor (lbs/10 <sup>6</sup> lbs)
Styrene	100-42-5	130
1,3-butadiene	106-99-0	0.93
Acrylonitrile	107-13-1	5.74
Ethylbenzene	100-41-4	27.6
Acetophenone	98-86-2	2.78

**HAP Emission Factors from Processing Nylon**

HAP Constituent	CAS #	<sup>(3)</sup> Emission Factor (lbs/10 <sup>6</sup> lbs)
Styrene	100-42-5	0.01

D.A. #	Resin Type	Max Throughput Rate (lbs resin/hr)	Acetaldehyde Emissions (tons/yr)	Acrolein Emissions (tons/yr)	Formaldehyde Emissions (tons/yr)	Propionaldehyde Emissions (tons/yr)	Acrylic acid Emissions (tons/yr)	Styrene Emissions (tons/yr)	1,3-butadiene Emissions (tons/yr)	Acrylonitrile Emissions (tons/yr)	Ethylbenzene Emissions (tons/yr)	Acetophenone Emissions (tons/yr)
562	<sup>(1)</sup> POM	9.76	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
959	<sup>(1)</sup> PP	8.77	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
561	<sup>(1)</sup> PP	1.98	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
1151	<sup>(1)</sup> PP	4.44	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
563	<sup>(1)</sup> PP	13.73	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
2277	<sup>(1)(4)</sup> PP	115.00	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
2245	<sup>(2)</sup> ABS	3.74	NA	NA	NA	NA	NA	0.00	0.00	0.00	0.00	0.00
578	<sup>(1)</sup> POM	9.23	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
2006	<sup>(3)</sup> PA6/GF30	10.89	NA	NA	NA	NA	NA	0.00	NA	NA	NA	NA
576	<sup>(2)</sup> ABS	13.58	NA	NA	NA	NA	NA	0.01	0.00	0.00	0.00	0.00
1007	<sup>(1)</sup> PP	5.45	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
2242	<sup>(1)</sup> PP/GF10	4.05	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
2244	<sup>(1)</sup> PP/GF10	59.40	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
288	<sup>(1)</sup> POM	29.85	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
573	<sup>(2)</sup> ABS	11.87	NA	NA	NA	NA	NA	0.01	0.00	0.00	0.00	0.00
962	<sup>(3)</sup> PA6/GF30	16.16	NA	NA	NA	NA	NA	0.00	NA	NA	NA	NA
1029	<sup>(1)</sup> PP	24.09	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
1030	<sup>(1)</sup> PP	21.96	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
1200	<sup>(1)</sup> PP	17.09	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
2511	<sup>(1)</sup> PP	4.90	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
2512	<sup>(1)</sup> PP	25.00	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
572	<sup>(2)</sup> ABS	24.51	NA	NA	NA	NA	NA	0.01	0.00	0.00	0.00	0.00
570	<sup>(1)</sup> PBT	14.27	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
305T	<sup>(2)</sup> ABS	182.00	NA	NA	NA	NA	NA	0.10	0.00	0.00	0.02	0.00
450T	<sup>(1)</sup> PP	150.00	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
860T	<sup>(1)</sup> PP	60.00	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
2517	<sup>(1)</sup> PP	88.00	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
272	<sup>(1)</sup> PP	17.65	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
1196	<sup>(1)</sup> PP	20.96	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
1195	<sup>(1)</sup> PP	27.21	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
569	<sup>(1)</sup> PP	29.29	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
2518	<sup>(1)</sup> PP	16.50	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
2278	<sup>(1)(4)</sup> PP	115.00	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
568	<sup>(1)</sup> PP	25.80	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
565	<sup>(1)</sup> PP	106.23	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
368	<sup>(1)</sup> PP	20.72	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
567	<sup>(1)</sup> PP	8.04	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
566	<sup>(1)</sup> PP	14.90	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
564	<sup>(2)</sup> PC/ABS	114.67	NA	NA	NA	NA	NA	0.07	0.00	0.00	0.01	0.00
1013	<sup>(1)</sup> PP	61.22	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
2035	<sup>(2)</sup> ABS	59.16	NA	NA	NA	NA	NA	0.03	0.00	0.00	0.01	0.00
2513	<sup>(1)</sup> PP	116.00	0.00	0.00	0.00	0.00	0.00	0.07	0.00	0.00	0.01	0.00
2514	<sup>(1)</sup> PP	116.00	0.00	0.00	0.00	0.00	0.00	0.07	0.00	0.00	0.01	0.00
2515	<sup>(1)</sup> PP	36.00	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.00	0.00	0.00
2099	<sup>(2)</sup> ABS	12.49	NA	NA	NA	NA	NA	0.01	0.00	0.00	0.00	0.00
1372	<sup>(1)</sup> PP	56.80	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
2282	<sup>(1)</sup> PP	59.56	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
668	<sup>(1)</sup> PP	41.50	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
2348	<sup>(1)</sup> PP	77.19	0.00	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA
<b>Totals</b>			<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.01</b>	<b>0.00</b>	<b>0.39</b>	<b>0.00</b>	<b>0.02</b>	<b>0.08</b>	<b>0.01</b>
<b>Total Combined HAPs</b>			<b>0.52</b>									

**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**

These resin type and maximum throughput were submitted by the source.

The emission factors above were taken from technical papers described below in notes 1 through 5. This methodology and the emission factors were used in Registration No. 005-28577-00102, issued on January 21, 2010.

<sup>(1)</sup> Emission factors for HAPs from Polypropylene molding were taken from a technical paper, volume 49, published in January 1999, 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 from Table 5. The emission factors for PP were used for the PE resins.

<sup>(2)</sup> Emission factors for HAPs from ABS and PC/ABS Resins 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, published in September 1995 of the Journal of Air and Waste Management Association. The Auto HAPs emission factors from Table 4 was used.

<sup>(3)</sup> Emission factors for HAPs from polyamide processing were taken from the technical paper, "Development of Emission Factors for Polyamide Processing", from Volume 51, published in July 2001 of the Journal of Air and Waste Management Association. General PA6 Low Caprolactam was used from Table 3.

<sup>(4)</sup> In order to be conservative, a maximum throughput rate of 115 pounds of resin per hour with ABS as the resin was used to calculate the worse case PTE.

**Appendix A: Emission Calculations  
Fugitive Dust Emissions - Paved Roads**

**Company Name: K & M Indiana LLC dba Mitchell Plastics  
Address City IN Zip: 301 Pike Street, Charlestown, Indiana 47111  
Permit Number: F019-36571-00103  
Reviewer: Monica Dick**

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch. 13.2.1 (12/2003).

<sup>1</sup>Vehicle Information (conservative assumptions by IDEM)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Passenger Vehicles entering plants	220	1	220	3	550	800	0.15	33.33	12,167
PassengerVehicle leaving plants	220	1	220	3	550	800	0.15	33.33	12,167
Truck entering plants	20	1	20	16	320	200	0.04	0.76	277
Truck leaving plants	20	1	20	25	500	200	0.04	0.76	277
<b>Total</b>			<b>480</b>		<b>1,920</b>			<b>68.2</b>	<b>24,886</b>

Note 1: The source did not provide vehicle information for the registration. Therefore, IDEM made conservative assumptions for passenger vehicles and trucks to estimate the PTE particulate from roads.

Average Vehicle Weight Per Trip =  $\frac{4.0}{0.14}$  tons/trip  
Average Miles Per Trip =  $\frac{4.0}{0.14}$  miles/trip

Unmitigated Emission Factor, Ef =  $[k * (sL)^{0.91} * (W)^{1.02}]$  (Equation 1 from AP-42 13.2.1.3 (01/2011))

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	4.0	4.0	4.0	tons = average vehicle weight (provided by source)
sL =	0.6	0.6	0.6	g/m <sup>2</sup> = Ubitiguous Baseline Silt Loading Values of paved roads (Table 13.2.1-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext =  $E * [1 - (p/4N)]$

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

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.03	0.01	0.00	lb/mile
Mitigated Emission Factor, Eext =	0.03	0.01	0.00	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Passenger Vehicles entering plants	0.17	0.03	0.01	0.16	0.03	0.01
PassengerVehicle leaving plants	0.17	0.03	0.01	0.16	0.03	0.01
Truck entering plants	0.00	0.00	0.00	0.00	0.00	0.00
Truck leaving plants	0.00	0.00	0.00	0.00	0.00	0.00
	<b>0.35</b>	<b>0.07</b>	<b>0.02</b>	<b>0.32</b>	<b>0.06</b>	<b>0.02</b>

**Methodology**

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

**Abbreviations**

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



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

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

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

March 9, 2016

Ms. Pami Egan  
K & M Indiana LLC dba Mitchell Plastics  
301 Pike Street  
Charlestown, IN 47111

Re: Public Notice  
K & M Indiana LLC dba Mitchell Plastics  
Permit Level: FESOP - Renewal  
Permit Number: 019 - 36571 - 00103

Dear Ms. Egan:

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 Evening News in Jeffersonville, Indiana publish the abbreviated version of the public notice no later than March 12, 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 Charlestown Clark Co public Library, 51 Clark Rd in Charlestown 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 Monica Dick, 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 4-1243 or dial (317) 234-1243.

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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Commissioner

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

March 9, 2016

Evening News  
Attn: Classifieds  
221 Spring Street  
Jeffersonville, Indiana 47130

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for K & M Indiana LLC dba Mitchell Plastics, Clark 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 March 12, 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: 019 - 36571 - 00103

Enclosure  
PN Newspaper.dot 6/13/2013



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

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

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

March 9, 2016

To: Charlestown Clark Co public Library 51 Clark Rd Charlestown 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: K & M Indiana LLC dba Mitchell Plastics**  
**Permit Number: 019 - 36571 - 00103**

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



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## Notice of Public Comment

**March 9, 2016**

**K & M Indiana LLC dba Mitchell Plastics**

**019 - 36571 - 00103**

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 3/9/2016 K & M Indiana LLC dba Mitchell Plastics 019 - 36571 - 00103 draft		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Pami Egan K & M Indiana LLC dba Mitchell Plastics 301 Pike Street Charlestown IN 47111 (Source CAATS)									
2		Rick Cartuyvelles GM K & M Indiana LLC dba Mitchell Plastics 301 Pike Street Charlestown IN 47111 (RO CAATS)									
3		Ms. Rhonda England 17213 Persimmon Run Rd Borden IN 47106-8604 (Affected Party)									
4		Charlestown Clark Co public Library 51 Clark Rd Charlestown IN 47111-1997 (Library)									
5		Ms. Betty Hislip 602 Dartmouth Drive, Apt 8 Clarksville IN 47129 (Affected Party)									
6		Charlestown City Council and Mayors Office 304 Main Cross Street Charlestown IN 47111-1230 (Local Official)									
7		H & H Metal Products 104 Industrial Way Chalestown In 47111 (Affected Party)									
8		Mr. Paul Grayson Superior Vault Co, Inc 500 Pike St Charlestown IN 47111 (Affected Party)									
9		Mr. Steve Spies Rhodes, Inc 100 Quality Ct Charlestown IN 47111 (Affected Party)									
10		Clark County Board of Commissioners 501 E. Court Avenue Jeffersonville IN 47130 (Local Official)									
11		Clark County Health Department 1320 Duncan Avenue Jeffersonville IN 47130-3723 (Health Department)									
12		R & R Donnelly 100 Quality Court Charlestown IN 47111 (Affected Party)									
13		Big G Supply 600 Pike Street Charlestown IN 47111 (Affected Party)									
14		Allens Heat & Air 300 Pike Street Charlestown IN 47111 (Affected Party)									
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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