INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Signficant Modification to a
Part 70 Operating Permit

for Dolco Packaging in Adams County

Significant Source Modification No.: 001-36607-00032
Significant Permit Modification/Revision No.: 001-36629-00032

The Indiana Department of Environmental Management (IDEM) has received an application from Dolco Packaging, located at 2110 Patterson Street, Decatur, Indiana, for a significant modification of its Part 70 Operating Permit issued on December 29, 2011. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Dolco Packaging to make certain changes at its existing source. Dolco Packaging has applied to construct and operate one (1) new extruder, identified as Extruder #6.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, 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). IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

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

Adams Public Library
128 South 3rd Street
Decatur, IN 46733

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

How can you participate in this process?

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

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

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

application, please contact IDEM at the address below. Please refer to permit number SSM 001-36607-00032 and SPM 001-36629-00032 in all correspondence.

Comments should be sent to:

Brian Williams
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-5375
Or dial directly: (317) 234-5375
Fax: (317) 232-6749 attn: Brian Williams
E-mail: bwilliam@idem.IN.gov

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

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

What will happen after IDEM makes a decision?

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

If you have any questions, please contact Brian Williams 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

Carol S. Comer
Commissioner

DRAFT

Mr. Richard Schroeder
Dolco Packaging
2110 Patterson Street
Decatur, Indiana 46733

Re: 001-36607-00032
Significant Source Modification

Dear Mr. Schroeder:

Dolco Packaging was issued Part 70 Operating Permit Renewal No. T001-30927-00032 on December 29, 2011 for a stationary polystyrene extrusion plant located at 2110 Patterson Street, Decatur, Indiana. An application to modify the source was received on December 15, 2015. Pursuant to the provisions of 326 IAC 2-7-10.5, a Significant Source Modification is hereby approved as described in the attached Technical Support Document.

Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

(a) One (1) polystyrene food packaging production line, modified in 2011 to add one (1) extruder, approved in 2015 for modification to add one (1) thermoformer, and approved in 2016 for modification to add one (1) extruder, consisting of the following:

(1) One (1) polystyrene foam extruder, identified as E-6, approved in 2016 for construction, equipped with an inlet butane gas flow monitor, with a maximum capacity of 34.44 pounds of butane blowing agent per hour, and with emissions uncontrolled and exhausting to the indoors. The nominal butane gas allocation will vary.

Insignificant activities consisting of the following:

(b) Emission units with PM and PM10 emissions less than five (5) tons per year, SO_2, NOx, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and five-tenths (2.5) tons per year:

(1) One (1) extruder feed container for talc.

(2) One (1) extruder feed container for colorator.

The following construction conditions are applicable to the proposed modification:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

DRAFT

2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

3. Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

Commenced Construction

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(j), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Approval to Construct

6. Pursuant to 326 IAC 2-7-10.5(h)(2), this Significant Source Modification authorizes the construction of the new emission unit(s), when the Significant Source Modification has been issued.

   Pursuant to 326 IAC 2-7-10.5(m), the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

   Pursuant to 326 IAC 2-7-12, operation of the new emission unit(s) is not approved until the Significant Permit Modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification in accordance with 326 IAC 2-7-10.5(m)(2) and 326 IAC 2-7-12 (Permit Modification).

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

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

If you have any questions on this matter, please contact Brian Williams of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Brian Williams or extension 4-5375 or dial (317) 234-5375.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Significant Source Modification and Technical Support Document
cc: File - Adams County
Adams County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch

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Commissioner

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Significant Source Modification to a Part 70 Source

OFFICE OF AIR QUALITY

Dolco Packaging
2110 Patterson Street
Decatur, Indiana 46733

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

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

Significant Source Modification No.: 001-36607-00032	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance 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 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary polystyrene extrusion plant.

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

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

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

(a) One (1) polystyrene food packaging production line, modified in 2010, approved in 2015 for modification to add one (1) thermoformer, and approved in 2016 for modification to add one (1) extruder, consisting of the following:

(1) One (1) curing room, constructed in 1997, equipped with one (1) natural gas fired regenerative thermal oxidizer, constructed in 1998, with a maximum capacity of two (2) million British thermal units per hour.

(2) One (1) outside storage curing area, constructed in 1972, with VOC emissions uncontrolled.

(3) Four (4) polystyrene foam extruders, constructed in 1972, with VOC emissions uncontrolled and exhausting to the indoors, with maximum capacities included in a confidential file.

(4) One (1) polystyrene foam extruder, identified as E-5, constructed in 2011, equipped with an inlet butane gas flow monitor, with a maximum capacity based on butane gas allocation, and with VOC emissions uncontrolled and exhausting to the indoors.

(5) One (1) polystyrene foam extruder, identified as E-6, approved in 2016 for construction, equipped with an inlet butane gas flow monitor, with a maximum capacity of 34.44 pounds of butane blowing agent per hour, and with emissions uncontrolled and exhausting to the indoors. The nominal butane gas allocation will vary.

(6) Eleven (11) thermoformers, with VOC uncontrolled and exhausting to the indoors.

(7) Eleven (11) underpress grinders, located under the thermoformers, for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse, with VOC and particulate emissions directed to silo baghouses which vent to the RTO pre-filter and then the regenerative thermal oxidizer (RTO) for control.

(8) One (1) extruder waste grinder, constructed in 1972, for the grinding of scrap from the extrusion process as the scrap is processed in preparation for reuses, with VOC and particulate emissions directed to silo baghouses which vent to the RTO pre-filter and then the regenerative thermal oxidizer (RTO) for control.

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

(1) Eight (8) offset printers, constructed in 1972,

(2) one (1) offset printer, constructed in 2010, and

(3) one (1) offset printer, approved in 2015 for construction.

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

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

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

(b) Enclosed systems for conveying plastic raw materials and plastic finished goods.

(c) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(d) Gasoline generators not exceeding 110 horsepower.

(e) Stationary fire pumps.

(f) Emission units with PM and PM10 emissions less than five (5) tons per year, SO_2, NOx, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and five-tenths (2.5) tons per year:

(1) One (1) butane compressed gas storage tank A, installed in 1990, with a capacity of 15,000 gallons.

(2) One (1) idle gas storage tank B, installed in 1972, with a capacity of 7,000 gallons, charged with nitrogen to inhibit corrosion.

(3) Two (2) virgin pellet silos, with virgin pellets directly charged into the silo via a truck feed line, each with a maximum throughput of 3,873 pounds of pellets per hour, uncontrolled, and exhausting to the indoors.

(4) Six (6) extruder feed containers for talc, with a maximum throughput of 29.52 pounds per hour, uncontrolled, and exhausting to the indoors.

(5) Six (6) extruder feed containers for colorator, with a maximum throughput of 6.5 pounds per hour, uncontrolled, and exhausting to the indoors.

(6) Eight (8) day tanks for material handling and transfer.

(7) Nine (9) silos for regrind flake recycling, constructed in 1972, with maximum capacities included in a confidential file, each equipped with a baghouse which vents to the RTO pre-filter and then the regenerative thermal oxidizer (RTO) to control particulate emissions.

(8) Cured rollstock operations associated with processing of polystyrene foam shipped from outside.

(9) Repelletizer installed in 1994, with a capacity of 500 lbs/hr.

(g) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:

(1) Nine (9) natural gas-fired heaters, identified as Heater Unit 1 through 9, each with a maximum heat input capacity of 0.28 MMBtu/hr, uncontrolled, and exhausting to the outdoors.

(2) One (1) natural gas-fired heaters, identified as Heater Unit 10, with a maximum heat input capacity of 0.15 MMBtu/hr, uncontrolled, and exhausting to the outdoors.

(3) Two (2) natural gas-fired roof heaters, identified as Roof Heater Unit 1 and 2, each with a maximum heat input capacity of 1.05 MMBtu/hr, uncontrolled, and exhausting to the outdoors.

(4) Three (3) natural gas-fired roof heaters, identified as Roof Heater Unit 3 through 5, each with a maximum heat input capacity of 0.50 MMBtu/hr, uncontrolled, and exhausting to the outdoors.

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

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

(a) This permit, T001-30927-00032, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.6 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

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

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

B.8 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(34).

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

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

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

and

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

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

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

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

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

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

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

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

B.16 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

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

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

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar

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

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

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

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

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

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

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

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

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

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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

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

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

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

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

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

(b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of

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

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

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

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

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

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

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

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

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

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

no later than 180 days from the date on which this source commences operation.

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

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

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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

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

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

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

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

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

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

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

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

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

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

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

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

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

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

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

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

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

(AA) The date, place, as defined in this permit, and time of sampling or

measurements.

(BB) The dates analyses were performed.

(CC) The company or entity that performed the analyses.

(DD) The analytical techniques or methods used.

(EE) The results of such analyses.

(FF) The operating conditions as existing at the time of sampling or measurement.

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

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

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

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

(b) The address for report submittal is:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) polystyrene food packaging production line, modified in 2010, approved in 2015 for modification to add one (1) thermoformer, and approved in 2016 for modification to add one (1) extruder, consisting of the following:

(1) One (1) curing room, constructed in 1997, equipped with one (1) natural gas fired regenerative thermal oxidizer, constructed in 1998, with a maximum capacity of two (2) million British thermal units per hour.

(2) One (1) outside storage curing area, constructed in 1972, with VOC emissions uncontrolled.

(3) Four (4) polystyrene foam extruders, constructed in 1972, with VOC emissions uncontrolled and exhausting to the indoors, with maximum capacities included in a confidential file.

(4) One (1) polystyrene foam extruder, identified as E-5, constructed in 2011, equipped with an inlet butane gas flow monitor, with a maximum capacity based on butane gas allocation, and with VOC emissions uncontrolled and exhausting to the indoors.

(5) One (1) polystyrene foam extruder, identified as E-6, approved in 2016 for construction, equipped with an inlet butane gas flow monitor, with a maximum capacity of 34.44 pounds of butane blowing agent per hour, and with emissions uncontrolled and exhausting to the indoors. The nominal butane gas allocation will vary.

(6) Eleven (11) thermoformers, with VOC uncontrolled and exhausting to the indoors.

(7) Eleven (11) underpress grinders, located under the thermoformers, for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse, with VOC and particulate emissions directed to silo baghouses which vent to the RTO pre-filter and then the regenerative thermal oxidizer (RTO) for control.

(8) One (1) extruder waste grinder, constructed in 1972, for the grinding of scrap from the extrusion process as the scrap is processed in preparation for reuses, with VOC and particulate emissions directed to silo baghouses which vent to the RTO pre-filter and then the regenerative thermal oxidizer (RTO) for control.

Insignificant Activities

(3) Two (2) virgin pellet silos, with virgin pellets directly charged into the silo via a truck feed line, each with a maximum throughput of 3,873 pounds of pellets per hour, uncontrolled, and exhausting to the indoors.

(7) Nine (9) silos for regrind flake recycling, constructed in 1972, with maximum capacities included in a confidential file, each equipped with a baghouse which vents to the RTO pre-filter and then the regenerative thermal oxidizer (RTO) to control particulate emissions.

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

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

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

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

(a) The input of butane as a VOC blowing agent to the polystyrene food packaging production line shall not exceed 905.08 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The VOC emissions from the following emission units shall not exceed the emission limits listed in the table below:

Emission Unit	Control Device	VOC Emission Limit (lb VOC/100 lb butane used)
Curing Room	RTO	13.15
Curing - Outside Storage	NA	4.86
Regrind Storage Silos	RTO	1.41
Extruders (#1 through #6)	NA	4.5
Thermoforming Building Area	NA	1.53
Thermoforming Waste Grinders	RTO	15.63
Extruder Waste Grinders	RTO	3.15
Finished Product Storage	NA	10.02

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

(d) The PM emissions from the polystyrene food packaging production line, controlled by nine (9) baghouses, shall not exceed 9.67 pounds per hour.

(e) The PM10 emissions from the polystyrene food packaging production line, controlled by nine (9) baghouses, shall not exceed 9.67 pounds per hour.

(f) The PM2.5 emissions from the polystyrene food packaging production line, controlled by nine (9) baghouses, shall not exceed 9.67 pounds per hour.

Compliance with these limits, combined with the potential to emit PM, PM10, PM2.5, and VOC from all other emission units at this source, shall limit the source-wide PM, PM10, PM2.5, and VOC emissions to less than 250 tons per twelve (12) consecutive month period, each and render 326 IAC 2-2 (PSD) not applicable.

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

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

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

(b) The VOC emissions for the extruder identified as E-5 shall not exceed 4.5 lb VOC/100 lb

butane.

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

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

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the polystyrene food packaging production line, including the nine (9) silos and the final product storage operations, shall be limited to a total of 9.67 pounds per hour when operating at a total process weight rate of 3.6 tons per hour.

(b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each virgin feed silo shall not exceed 6.39 pounds per hour when operating at a process weight rate of 1.94 tons per hour, each.

The pound per hour limitations were calculated with the following equation:

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

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

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

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

Compliance Determination Requirements [326 IAC 2-7-5(1)]

D.1.5 Particulate Control

(a) In order to comply with Conditions D.1.1 and D.1.3, the nine (9) baghouses and RTO pre-filter for particulate control shall be in operation and control emissions from the polystyrene food packaging production line at all times that the polystyrene food packaging production line is in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

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

100% for curing room emissions,
100% for the thermoforming waste grinders,
100% for the extruder waste grinders, and

100% for the storage silos.

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

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

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

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

D.1.7 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purposes of this condition, continuous monitoring shall mean no less often than once per fifteen (15) minutes. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps whenever the hourly average temperature of the thermal oxidizer is below 1400°F. An hourly average temperature that is below 1400°F is not a deviation from this permit. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with condition D.1.1 as approved by IDEM.

(c) If the primary continuous monitoring system is not in operation, the oxidizer temperature will be recorded using some manner of secondary system, such as with back-up electro-mechanical hardware or manually if necessary. Nothing in this permit shall excuse the Permittee from complying with the requirement to continuously monitor the temperature of the thermal oxidizer. Continuous monitoring shall mean no less often than once per fifteen (15) minutes.

(d) The oxidizer shall operate such that if the hourly average temperature falls below the one (1) hour block average minimum required temperature (setpoint) as determined by the latest stack test, reasonable response steps shall be taken to return oxidizer temperature to at least the required minimum temperature setpoint. Reasonable response steps must return the oxidizer temperature to or above the minimum temperature setpoint within one (1) hour of the corrective action, or the polystyrene food packaging production line shall be shut off. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps or failure to shut off the polystyrene food packaging production line as stated above shall be considered a deviation from this permit.

D.1.8 Parametric Monitoring

(a) The Permittee shall determine the RTO fan Hertz from the most recent valid stack test that demonstrates compliance with Conditions D.1.1 and D.1.2, as approved by IDEM.

(b) The RTO fan Hertz shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the fan Hertz is outside the normal range of 41 to 43 Hertz or the range as established in the most recent compliant stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances, contains the Permittee's obligation with regard to the reasonable response

steps required by this condition. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit

(c) The instrument used for determining the butane gas flow input to extruder E-5 shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.9 Visible Emissions Notations

(a) Visible emission notations of each of the baghouse stack exhausts shall be performed once per day during normal daylight operations when exhausting directly to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.10 Parametric Monitoring

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

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

D.1.11 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies

as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.1.12 Record Keeping Requirement

(a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall:

(1) Maintain monthly records of the input of butane as a blowing agent to the six (6) extruder lines through material purchase records and volumetric measurements of the butane tank.

(2) Provide and maintain documentation supporting all of the VOC emission factors for the curing, storage, extrusion, thermoforming, and regrinding operations.

(b) To document the compliance status with Condition D.1.7, the Permittee shall maintain the continuous temperature records (on an hourly average basis) for the regenerative thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliance stack test.

(c) To document the compliance status with Condition D.1.8, the Permittee shall maintain daily records of the RTO fan Hertz.

(d) To document the compliance status with Condition D.1.9, the Permittee shall maintain records of once per day visible emission notations of each of the baghouse stack exhausts when exhausting directly to the atmosphere. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day or did not exhaust directly to the atmosphere).

(e) To document the compliance status with Condition D.1.10, the Permittee shall maintain once per day records of the pressure drop across the pre-filter for the thermal oxidizer. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

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

D.1.13 Reporting Requirements

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

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

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

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

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

PART 70 OPERATING PERMIT

EMERGENCY OCCURRENCE REPORT

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

This form consists of 2 pages **Page 1 of 2**

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

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Dolco Packaging
Source Address: 2110 Patterson Street, Decatur, Indiana 46733
Part 70 Permit No.: T001-30927-00032
Facility: Polystyrene food packaging production line
Parameter: Source-wide butane blowing agent input
Limit: The input of butane as a blowing agent shall not exceed 905.08 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER : YEAR:

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

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

Part 70 Quarterly Report

Source Name: Dolco Packaging
Source Address: 2110 Patterson Street, Decatur, Indiana 46733
Part 70 Permit No.: T001-30927-00032
Facility: Extruder (E5)
Parameter: Butane blowing agent input
Limit: The input of butane as a blowing agent shall not exceed 151 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER : YEAR:

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

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

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

Months: _____ to _____ Year: _____

Page 1 of 2

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

Page 2 of 2

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

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

Dolco Packaging
2110 Patterson Street
Decatur, Indiana 46733

Affidavit of Construction

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

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)

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

Further Affiant said not.

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

Signature_____
Date_____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana

on this _____ day of _____, 20 _____. My Commission expires: _____.

Signature_____
Name_____ (typed or printed)

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Source Modification and Significant Permit Modification

Source Description and Location

Source Name:	Dolco Packaging
Source Location:	2110 Patterson Street, Decatur, Indiana 46733
County:	Adams
SIC Code:	3086 (Plastics Foam Products)
Operation Permit No.:	T001-30927-00032
Operation Permit Issuance Date:	December 29, 2011
Significant Source Modification No.:	001-36607-00032
Significant Permit Modification No.:	001-36629-00032
Permit Reviewer:	Brian Williams

Existing Approvals

The source was issued Part 70 Operating Permit No. 001-30927-00032 on December 29, 2011. The source has since received the following approvals:

(a) Administrative Amendment No. 001-36352-00032, issued on November 4, 2015.

County Attainment Status

The source is located in Adams County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective July 20, 2012 for the 2008 8-hour ozone standard.[1]
$PM_{2.5}$	Unclassifiable or attainment effective April 5, 2005, for the annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 24-hour $PM_{2.5}$ standard.
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

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

(b) $PM_{2.5}$
Adams County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Adams County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Modification (tons/year)								
	PM	PM10*	PM2.5**	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Polystyrene Manufacturing Process	21.08 (b)	21.08 (b)	21.08 (b)	-	-	165.65 (a)	-	0.40	0.37 Styrene
Thermal Oxidizer and Heater Natural Gas Combustion	0.07	0.27	0.27	0.02	3.55	0.20	2.98	0.07	0.06 Hexane
Printing	-	-	-	-	-	9.78	-	-	-
Total PTE of Entire Source	**21.15**	**21.35**	**21.35**	**0.02**	**3.55**	**175.63**	**2.98**	**0.47**	**0.37 Styrene**
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-

*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
**$PM_{2.5}$ listed is direct $PM_{2.5}$.
(a) Limited to render 326 IAC 2-2 (PSD) not applicable.
(b) PTE after control

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

(c) On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) 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.

(d) These emissions are based upon the TSD to Part 70 Administrative Amendment No. 001-36352-00032, issued on November 4, 2015.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Dolco Packaging on December 15, 2015, relating to the construction and operation of one (1) new extruder, identified as Extruder #6. Due to the addition of this new extruder the source has requested to increase the butane input limit for the existing polystyrene food packaging production line from 754.2 tons per year to 905.08 tons per year in order to maintain the PSD minor status of this source. The following is a list of the proposed emission units:

(a) One (1) polystyrene food packaging production line, modified in 2011 to add one (1) extruder, approved in 2015 for modification to add one (1) thermoformer, and approved in 2016 for modification to add one (1) extruder, consisting of the following:

(1) One (1) polystyrene foam extruder, identified as E-6, approved in 2016 for construction, equipped with an inlet butane gas flow monitor, with a maximum capacity of 34.44 pounds of butane blowing agent per hour, and with emissions uncontrolled and exhausting to the indoors. The nominal butane gas allocation will vary.

Insignificant activities consisting of the following:

(b) Emission units with PM and PM10 emissions less than five (5) tons per year, SO_2, NOx, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and five-tenths (2.5) tons per year:

(1) One (1) extruder feed container for talc.

(2) One (1) extruder feed container for colorator.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

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

Permit Level Determination – Part 70 Modification to an Existing Source

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

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

PTE Before Controls of Extruder #6	
Pollutant	**Potential To Emit** (ton/yr)
PM	0
PM_{10}	0
$PM_{2.5}$	0
SO_2	0
NO_X	0
VOC	6.79
CO	0
Single HAPs	0
Total HAPs	0

PTE Change of the Modified Polystyrene Food Packaging Production Line			
Pollutant	**PTE Before Modification** (ton/yr)	**PTE After Modification** (ton/yr)	**Increase from Modification*** (ton/yr)
PM	21.08	54.74	33.66
PM_{10}	21.08	50.33	29.25
$PM_{2.5}$	21.08	50.33	29.25
SO_2	0	0	0
NO_X	0	0	0
VOC	165.65	191.99	26.34
CO	0	0	0
HAPs	0.40	0.47	0.07

* Due to the increase of the butane input limit for the existing polystyrene food packaging production line from 754.2 tons per year to 905.08 tons per year.

Total PTE Increase due to the Modification			
Pollutant	**PTE New Emission Units** (ton/yr)	**Net Increase to PTE of Modified Emission Units** (ton/yr)	**Total PTE for New and Modified Units** (ton/yr)
PM	0	33.66	33.66
PM_{10}	0	29.25	29.25
$PM_{2.5}$	0	29.25	29.25
SO_2	0	0	0
NO_X	0	0	0
VOC	6.79	26.34	33.13
CO	0	0	0
HAPs	0	0.07	0.07

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

(a) Significant Source Modification - Approval to Construct
This source modification is subject to 326 IAC 2-7-10.5(g)(4) because the modification has a potential to emit greater than twenty-five (25) tons per year of PM, PM20, PM2.5, and VOC.

(b) Significant Permit Modification - Approval to Operate
This modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1) because the modification involves significant change in permit terms or conditions (such as a case-by-case determination of emission limitations).

Permit Level Determination – PSD

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 source and permit modification, 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 Modification (tons/year)								
	PM	PM10*	PM2.5**	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Polystyrene Manufacturing Process[(a)]	54.74	50.33	50.33	-	-	198.78	-	0.47	0.44 Styrene
Thermal Oxidizer and Heater Natural Gas Combustion	0.07	0.27	0.27	0.02	3.55	0.20	2.98	0.07	0.06 Hexane
Printing	-	-	-	-	-	9.78	-	-	-
Total PTE of Entire Source	**54.81**	**50.60**	**50.60**	**0.02**	**3.55**	**208.76**	**2.98**	**0.54**	**0.44 Styrene**
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-

*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
**$PM_{2.5}$ listed is direct $PM_{2.5}$.
(a) The PM, PM10, PM2.5, and VOC emissions have been limited to render 326 IAC 2-2 (PSD) not applicable.

This modification to an existing minor PSD stationary source is not major because the emissions increase of each PSD regulated pollutant are less than the PSD major source thresholds for this modification. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply to this modification. In order to maintain the PSD minor status of this source, the existing VOC PSD minor limits will be revised in this modification.

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

(a) The input of butane as a VOC blowing agent to the polystyrene food packaging production line shall not exceed 905.08 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Due to this modification the butane input limit will be increased from 754.2 tons per year to 905.08 tons per year. This is a Title 1 change.

(b) The VOC emissions from the following emission units shall not exceed the emission limits listed in the table below:

Emission Unit	Control Device	VOC Emission Limit (lb VOC/100 lb butane used)
Curing Room	RTO	13.15
Curing - Outside Storage	NA	4.86
Regrind Storage Silos	RTO	1.41
Extruders (#1 through #6)	NA	4.5
Thermoforming Building Area	NA	1.53
Thermoforming Waste Grinders	RTO	15.63
Extruder Waste Grinders	RTO	3.15
Finished Product Storage	NA	10.02

Due to this modification, IDEM is clarifying that these are enforceable emission limits not emission factors. This is a Title 1 change.

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

These are existing limits that are not being revised due to this modification.

(d) The PM emissions from the polystyrene food packaging production line, controlled by nine (9) baghouses, shall not exceed 9.67 pounds per hour.

(e) The PM10 emissions from the polystyrene food packaging production line, controlled by nine (9) baghouses, shall not exceed 9.67 pounds per hour.

(f) The PM2.5 emissions from the polystyrene food packaging production line, controlled by nine (9) baghouses, shall not exceed 9.67 pounds per hour.

Prior to transitioning from a FESOP to a Part 70 Operating Permit, the source had PSD minor limits for PM and PM10. However, Part 70 Operating Permit No. 001-30927-00032, issued on December 29, 2011 did not contain any enforceable PSD minor limits for PM, PM10, and PM2.5. The particulate matter emissions from the polystyrene food packaging production line are controlled by nine (9) baghouses and the source intended to remain a minor PSD source for PM, PM10, and PM2.5. Therefore, due to this modification, IDEM is including enforceable PSD minor limits for these pollutants. This is a Title 1 change.

Compliance with these limits, combined with the potential to emit PM, PM10, PM2.5, and VOC from all other emission units at this source, shall limit the source-wide PM, PM10, PM2.5, and VOC emissions to less than 250 tons per twelve (12) consecutive month period, each and render 326 IAC 2-2 (PSD) not applicable.

Federal Rule Applicability Determination

The following federal rules are applicable to the source due to this modifcation:

New Source Performance Standards (NSPS)

(a) The requirements of the New Source Performance Standard for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry, 40 CFR Part 60, Subpart DDD (326 IAC 12) are not included in this proposed modification because the source does not manufacture polypropylene, polyethylene, polystyrene, or poly (ethylene terephthalate) as defined in 40 CFR Part 60.561.

(b) There are no New Source Performance Standards (NSPS) (40 CFR Part 60 and 326 IAC 12) applicable to this proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Flexible Polyurethane Foam Production, 40 CFR Part 63, Subpart III (326 IAC 20-22), are not included in the proposed modification, since this source does not produce flexible polyurethane foam or rebound foam and is not a major source of HAPs.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Flexible Polyurethane Foam Fabrication Operations, 40 CFR Part 63, Subpart MMMMM (326 IAC 20-66), are not included in the proposed modification, since this source does not operate a flexible polyurethane foam fabrication plant and is not a major source of HAPs.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Flexible Polyurethane Foam Production and Fabrication Area Sources, 40 CFR Part 63, Subpart OOOOOO (326 IAC 20), are not included in the proposed modification, since this source does not produce flexible polyurethane foam or rebound foam or operate a flexible polyurethane foam fabrication plant at an area source of HAPs.

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

Compliance Assurance Monitoring (CAM)

(g) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

(1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

CAM Applicability Analysis							
Emission Unit	**Control Device Used**	**Emission Limitation** (Y/N)	**Uncontrolled PTE** (ton/yr)	**Controlled PTE** (ton/yr)	**Part 70 Major Source Threshold** (ton/yr)	**CAM Applicable** (Y/N)	**Large Unit** (Y/N)
Extruder #1 through #6 - VOC	N	-	-	-	100	N	-
Curing Room - VOC	Y	Y 326 IAC 2-2	>100	<100	100	Y	N
Curing - Outside Storage - VOC	N	-	-	-	100	N	-
Regrind Silos - PM	Y	Y 326 IAC 6-3-2 326 IAC 2-2	>100	<100	100	Y	N
Regrind Silos - PM10	Y	Y 326 IAC 2-2	>100	<100	100	Y	N
Regrind Silos - PM2.5	Y	Y 326 IAC 2-2	>100	<100	100	Y	N
Regrind Silos - VOC	Y	Y 326 IAC 2-2	<100	-	100	N	N
Thermoformers - PM	Y	Y 326 IAC 6-3-2 326 IAC 2-2	>100	<100	100	Y	N
Thermoformers - PM10	Y	Y 326 IAC 2-2	>100	<100	100	Y	N
Thermoformers - PM2.5	Y	Y 326 IAC 2-2	>100	<100	100	Y	N
Thermoformers - VOC	N	-	-	-	100	N	-
Underpress Grinders - PM	Y	Y 326 IAC 6-3-2 326 IAC 2-2	>100	<100	100	Y	N
Underpress Grinders - PM10	Y	Y 326 IAC 2-2	>100	<100	100	Y	N
Underpress Grinders - PM2.5	Y	Y 326 IAC 2-2	>100	<100	100	Y	N
Underpress Grinders - VOC	Y	Y 326 IAC 2-2	>100	<100	100	Y	N
Extruder Waste Grinder - PM	Y	Y 326 IAC 6-3-2 326 IAC 2-2	>100	<100	100	Y	N
Extruder Waste Grinder - PM10	Y	Y 326 IAC 2-2	>100	<100	100	Y	N
Extruder Waste Grinder - PM2.5	Y	Y 326 IAC 2-2	>100	<100	100	Y	N
Extruder Waste Grinder - VOC	Y	Y 326 IAC 2-2	<100	-	100	Y	-
Finished Product Storage - VOC	N	-	-	-	100	N	-

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the regrind silos, thermoformers, underpress grinders, and extruder grinder for PM, PM10, and PM2.5 and the curing room, regrind silos, and underpress grinders for VOC upon issuance of the Title V Renewal. A CAM plan must be submitted as part of the Renewal application. This is a change in applicability due to this modification and is a Title 1 change.

State Rule Applicability Determination

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

326 IAC 2-2 (PSD)
PSD applicability is discussed under the Permit Level Determination – PSD section.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The polystyrene food packaging production line will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-7-6(5) (Annual Compliance Cerification)
The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certification that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

Extruder #6

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Extruder #6 does not have a potential to emit particulate matter. Therefore, the requirements of 326 IAC 6-3-2 are not applicable to this emission unit.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Extruder #6 is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from Extruder #6 is less than twenty-five (25) tons per year.

There are no other 326 IAC 8 Rules that are applicable to Extruder #6.

Extruder Feed Containers

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The potential to emit particulate matter emissions from the six (6) extruder feed containers for talc and six (6) extruder feed containers for colorator are less than 0.551 pounds per hour, each. Therefore, pursuant to 326 IAC 6-3-1(b)(14), each extruder feed container for talc and each extruder feed container for colorator are exempt from the requirements of this rule.

Virgin Feed Silo

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each virgin feed silo shall not exceed 6.39 pounds per hour when operating at a process weight rate of 1.94 tons per hour, each. The pound per hour limitation was calculated with the following equation:

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

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

Based on calculations, a control device is not needed to comply with this limit. This is a new requirement due to this modification.

Compliance Determination and Monitoring Requirements

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

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

(a) There are no new testing requirements applicable to this proposed modification. The source will demonstrate compliance with the VOC limits by keeping records of the butane input and performing VOC testing of the thermal oxidizer. The source last performed valid VOC testing on April 30, 2013 and this testing must be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. In addition, the source is not required to perform particulate matter testing of the polystyrene food packaging production line because the source has conservatively overestimated emissions using the baghouse specifications.

(b) There are no new compliance monitoring requirements applicable to this proposed modification.

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

Proposed Changes

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

(1) The emission unit descriptions in Sections A.2, A.3, and D.1 have been revised to reflect the new emission units and to clarify the existing emission units.

(2) Condition D.1.1 has been revised to increase the butane input limit, clarify that the emission factors are enforceable emission limits, and add new PM, PM10, and PM2.5 emission limits.

(3) Condition D.1.2(b) has been revised to clarify that this is an emission limit not emission factor.

(4) Condition D.1.3 has been revised to update the allowable PM limit for the polystyrene food packaging production line and to include a new allowable limit for the virgin feed silos.

(5) Condition D.1.5 has been revised to reflect that the baghouses and RTO pre-filter must be in operation to ensure compliance with the new PM, PM10, and PM2.5 emission limits in Condition D.1.1.

(6) The record keeping requirements in Condition D.1.12(a) have been revised to include the new extruder.

(7) The Part 70 Quarterly Report has been updated to reflect the new butane input limit.

...

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

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

(a) One (1) polystyrene food packaging production line, modified in 2010, approved in 2015 for modification to add one (1) thermoformer, **and approved in 2016 for modification to add one (1) extruder,** consisting of the following:

(1) One (1) curing room, constructed in 1997, equipped with one (1) natural gas fired regenerative thermal oxidizer, constructed in 1998, with a maximum capacity of ~~five (5)~~ **two (2)** million British thermal units per hour.

(2) One (1) outside storage curing area, constructed in 1972, with VOC emissions uncontrolled.

(~~2~~**3**) Four (4) polystyrene foam extruders, constructed in 1972, with VOC emissions **un**controlled ~~by a thermal oxidizer (constructed in 1998)~~ **and exhausting to the indoors**, with maximum capacities included in a confidential file.

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

~~(4) Eleven (11) thermoformers, with VOC and particulate emissions directed to silo baghouses which vent to a regenerative thermal oxidizer (RTO) for control.~~

(These units are not being removed, they are simply being re-arragned. See below.)

(~~5~~**4**) One (1) polystyrene foam extruder, identified as E-5, ~~approved in 2011 for construction~~ **constructed in 2011**, equipped with an inlet butane gas flow monitor, with a maximum capacity based on butane gas allocation, and with VOC emissions **un**controlled ~~by a thermal oxidizer (constructed in 1998)~~ **and exhausting to the indoors**.

(5) One (1) polystyrene foam extruder, identified as E-6, approved in 2016 for construction, equipped with an inlet butane gas flow monitor, with a maximum capacity of 34.44 pounds of butane blowing agent per hour, and with emissions uncontrolled and exhausting to the indoors. The nominal butane gas allocation will vary.

(6) Eleven (11) thermoformers, with VOC uncontrolled and exhausting to the indoors.

(7) Eleven (11) underpress grinders, located under the thermoformers, for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse, with VOC and particulate emissions directed to silo baghouses which vent to the RTO pre-filter and then the regenerative thermal oxidizer (RTO) for control.

(8) One (1) extruder waste grinder, constructed in 1972, for the grinding of scrap from the extrusion process as the scrap is processed in preparation for reuses, with VOC and particulate emissions directed to silo baghouses which vent to the RTO pre-filter and then the regenerative thermal oxidizer (RTO) for control.

...

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

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

...

(f) Emission units with PM and PM10 emissions less than five (5) tons per year, SO_2, NOx, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and five-tenths (2.5) tons per year:

(1) One (1) butane compressed gas storage tank A, installed in 1990, with a capacity of 15,000 gallons.

(2) One (1) idle gas storage tank B, installed in 1972, with a capacity of 7,000 gallons, charged with nitrogen to inhibit corrosion.

(3) Two (2) virgin pellet silos, with virgin pellets directly charged into the silo via a truck feed line, each with a maximum throughput of 3,873 pounds of pellets per hour, uncontrolled, and exhausting to the indoors.

(~~3~~**4**) ~~Five~~ **Six** (~~5~~**6**) extruder feed containers for talc**, with a maximum throughput of 29.52 pounds per hour, uncontrolled, and exhausting to the indoors**.

(~~4~~**5**) ~~Five~~ **Six** (~~5~~**6**) extruder feed containers for colorator**, with a maximum throughput of 6.5 pounds per hour, uncontrolled, and exhausting to the indoors**.

(~~5~~**6**) Eight (8) day tanks for material handling and transfer.

(~~6~~**7**) Nine (9) silos for regrind flake recycling, constructed in 1972, with maximum capacities included in a confidential file, each equipped with a baghouse **which vents to the RTO pre-filter and then the regenerative thermal oxidizer (RTO)** to control particulate emissions.

(~~7~~**8**) Cured rollstock operations associated with processing of polystyrene foam shipped from outside.

(~~8~~**9**) Repelletizer installed in 1994, with a capacity of 500 lbs/hr.

(g) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:

(1) Nine (9) natural gas-fired heaters, identified as Heater Unit 1 through 9, each with a maximum heat input capacity of 0.28 MMBtu/hr, uncontrolled, and exhausting to the outdoors.

(2) One (1) natural gas-fired heaters, identified as Heater Unit 10, with a maximum heat input capacity of 0.15 MMBtu/hr, uncontrolled, and exhausting to the outdoors.

(3) Two (2) natural gas-fired roof heaters, identified as Roof Heater Unit 1 and 2, each with a maximum heat input capacity of 1.05 MMBtu/hr,

uncontrolled, and exhausting to the outdoors.

(4) Three (3) natural gas-fired roof heaters, identified as Roof Heater Unit 3 through 5, each with a maximum heat input capacity of 0.50 MMBtu/hr, uncontrolled, and exhausting to the outdoors.

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) polystyrene food packaging production line, modified in 2010, approved in 2015 for modification to add one (1) thermoformer, **and approved in 2016 for modification to add one (1) extruder,** consisting of the following:

(1) One (1) curing room, constructed in 1997, equipped with one (1) natural gas fired regenerative thermal oxidizer, constructed in 1998, with a maximum capacity of ~~five (5)~~ **two (2)** million British thermal units per hour.

(2) One (1) outside storage curing area, constructed in 1972, with VOC emissions uncontrolled.

(2**3**) Four (4) polystyrene foam extruders, constructed in 1972, with VOC emissions **un**controlled ~~by a thermal oxidizer (constructed in 1998)~~ **and exhausting to the indoors**, with maximum capacities included in a confidential file.

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

~~(4) Eleven (11) thermoformers, with VOC and particulate emissions directed to silo baghouses which vent to a regenerative thermal oxidizer (RTO) for control.~~

(5**4**) One (1) polystyrene foam extruder, identified as E-5, approved in 2011 for construction **constructed in 2011**, equipped with an inlet butane gas flow monitor, with a maximum capacity based on butane gas allocation, and with VOC emissions **un**controlled ~~by a thermal oxidizer (constructed in 1998)~~ **and exhausting to the indoors**.

(5) One (1) polystyrene foam extruder, identified as E-6, approved in 2016 for construction, equipped with an inlet butane gas flow monitor, with a maximum capacity of 34.44 pounds of butane blowing agent per hour, and with emissions uncontrolled and exhausting to the indoors. The nominal butane gas allocation will vary.

(6) Eleven (11) thermoformers, with VOC uncontrolled and exhausting to the indoors.

(7) Eleven (11) underpress grinders, located under the thermoformers, for the grinding of scrap from the thermoforming process as the scrap is processed in preparation for reuse, with VOC and particulate emissions directed to silo baghouses which vent to the RTO pre-filter and then the regenerative thermal oxidizer (RTO) for control.

(8) One (1) extruder waste grinder, constructed in 1972, for the grinding of scrap from the extrusion process as the scrap is processed in preparation for reuses, with VOC and particulate emissions directed to silo baghouses which vent to the RTO pre-filter and then the regenerative thermal oxidizer (RTO) for control.

Insignificant Activities

(3) **Two (2) virgin pellet silos, with virgin pellets directly charged into the silo via a truck feed line, each with a maximum throughput of 3,873 pounds of pellets per hour, uncontrolled, and exhausting to the indoors.**

(~~6~~**7**) Nine (9) silos for regrind flake recycling, constructed in 1972, with maximum capacities included in a confidential file, each equipped with a baghouse **which vents to the RTO pre-filter and then the regenerative thermal oxidizer (RTO)** to control particulate emissions.

...

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

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

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

(a) The input of butane as a VOC blowing agent to the polystyrene food packaging production line shall not exceed ~~754.2~~ **905.08** tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

~~(b) The VOC emission factors shall not exceed the following:~~

~~Curing - 13.15 lb VOC/100 lb butane used~~
~~Storage - 4.86 lb VOC/100 lb butane used~~
~~Regrind storage silos - 1.41 lb VOC/100 lb butane used~~
~~Extruders - 4.5 lb VOC/100 lb butane~~
~~Thermoforming building area - 1.53 lb VOC/100 lb butane~~
~~Thermoforming waste grinders - 15.63 lb VOC/100 lb butane~~
~~Extruder waste grinders - 3.15 lb VOC/100 lb butane used~~
~~Finished product storage - 10.02 lb VOC/100 lb butane used~~

(These emissions factors are not being deleted or revised, they are simply being formatted in a table format. See below)

(b) The VOC emissions from the following emission units shall not exceed the emission limits listed in the table below:

Emission Unit	Control Device	VOC Emission Limit (lb VOC/100 lb butane used)
Curing Room	RTO	13.15
Curing - Outside Storage	NA	4.86
Regrind Storage Silos	RTO	1.41
Extruders (#1 through #6)	NA	4.5
Thermoforming Building Area	NA	1.53
Thermoforming Waste Grinders	RTO	15.63
Extruder Waste Grinders	RTO	3.15
Finished Product Storage	NA	10.02

(c) The Permittee shall operate the thermal oxidizer, with a minimum destruction efficiency of 97% and capture efficiency of 100% for curing room emissions, 100% for the

thermoforming waste grinders, 100% for extruder waste grinders, and 100% for the storage silos at all times that any of the associated processes are in operation.

(d) The PM emissions from the polystyrene food packaging production line, controlled by nine (9) baghouses, shall not exceed 9.67 pounds per hour.

(e) The PM10 emissions from the polystyrene food packaging production line, controlled by nine (9) baghouses, shall not exceed 9.67 pounds per hour.

(f) The PM2.5 emissions from the polystyrene food packaging production line, controlled by nine (9) baghouses, shall not exceed 9.67 pounds per hour.

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

Compliance with these limits, combined with the potential to emit PM, PM10, PM2.5, and VOC from all other emission units at this source, shall limit the source-wide PM, PM10, PM2.5, and VOC emissions to less than 250 tons per twelve (12) consecutive month period, each and render 326 IAC 2-2 (PSD) not applicable.

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

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

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

(b) The VOC emission**s** ~~factor~~ for the extruder identified as E-5 shall not exceed 4.5 lb VOC/100 lb butane.

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

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

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the polystyrene food packaging production line, including the nine (9) silos and the final product storage operations, shall be limited to a total of ~~8.56~~ **9.67** pounds per hour when operating at a total process weight rate of ~~3.0~~ **3.6** tons per hour. ~~This limit was calculated by the following:~~

(b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each virgin feed silo shall not exceed 6.39 pounds per hour when operating at a process weight rate of 1.94 tons per hour, each.

The pound per hour limitations were calculated with the following equation:

...

Compliance Determination Requirements **[326 IAC 2-7-5(1)]**

D.1.5 Particulate Control

(a) In order to comply with ~~c~~**C**onditions **D.1.1 and** D.1.3, the nine (9) baghouses and RTO pre-filter for particulate control shall be in operation and control emissions from the polystyrene food packaging production line at all times that the polystyrene food packaging production line is in operation.

...

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

D.1.12 Record Keeping Requirement

(a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall:

(1) Maintain monthly records of the input of butane as a blowing agent to the **six** (~~5~~**6**) extruder lines through material purchase records and volumetric measurements of the butane tank.

...

Part 70 Quarterly Report

...

Facility:	Polystyrene food packaging production line
Parameter:	Source-wide butane blowing agent input
Limit:	The input of butane as a blowing agent shall ~~be less than~~ **not exceed** ~~754.2~~ **905.08** tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

...

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

(1) 326 IAC 2-7-1 was updated on August 1, 2014. This rule update changed the rule cite for the definition of “Regulated Pollutant” used only for purposes of “Emission Reporting”. Therefore, Section C Emission Statement has been updated accordingly.

(2) IDEM added the rule citation 326 IAC 2-7-5(1) to the Compliance Determination Requirements subsection title in Section D. 1 to clarify the authority of these conditions.

(3) The Part 70 Quarterly Report for the extruder (E5) has been revised to match the emission limit in Condition D.1.2.

...

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

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

...

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(~~32~~**33**) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.

...

Part 70 Quarterly Report

Facility:	Extruder ~~installed in 2011~~ **(E-5)**
Parameter:	Butane blowing agent input
Limit:	The input of butane as a blowing agent shall ~~be less than~~ **not exceed** 151 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 001-36607-00032 and Significant Permit Modification No. 001-36629-00032. The staff recommend to the Commissioner that this Part 70 Significant Source Modification and Significant Permit Modification be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Brian Williams at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5375 or toll free at 1-800-451-6027 extension 4-5375.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

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

Appendix A: Emission Calculations
Summary of Emissions from Modification

Company Name: Dolco Packaging
Address City IN Zip: 2110 Patterson Street, Decatur, IN 46733
Significant Source Modification Number: 001-36607-00032
Significant Permit Modification Number: 001-36629-00032
Reviewer: Brian Williams

Potential to Emit of New Emission Units (tons/year)									
Process	**PM**	**PM10**	**PM2.5**	**SO2**	**NOx**	**VOC**	**CO**	**Total HAP**	**Single HAP**
Extruder #6	0	0	0	0	0	6.79	0	0	0
Total	**0**	**0**	**0**	**0**	**0**	**6.79**	**0**	**0**	**0**

Potential to Emit Change of Modified Process (tons/year)										
Process	**PM**	**PM10**	**PM2.5**	**SO2**	**NOx**	**VOC**	**CO**	**Total HAP**	**Single HAP**	
Polystyrene Food Packaging Production Line After Modification	54.74	50.33	50.33	0	0	191.99	0	0.47	0.44	Styrene
Polystyrene Food Packaging Production Line Before Modification	21.08	21.08	21.08	0	0	165.65	0	0.40	0.37	Styrene
Change in PTE of Modified Processes	**33.66**	**29.25**	**29.25**	**0**	**0**	**26.34**	**0**	**0.07**	**0.07**	**Styrene**

Total PTE Increase Due to the Modification (tons/year)										
Process	**PM**	**PM10**	**PM2.5**	**SO2**	**NOx**	**VOC**	**CO**	**Total HAP**	**Single HAP**	
Total PTE for New and Modified Units	**33.66**	**29.25**	**29.25**	**0**	**0**	**33.13**	**0**	**0.07**	**0.07**	**Styrene**

Methodology
Change in PTE of Modified Processes = PTE After Modification - PTE Before Modification
Total PTE for New and Modified Units = PTE New Emission Units + Change in PTE of Modified Processes

Appendix A: Emission Calculations
Summary of Unlimited and Limited Emissions

Company Name: **Dolco Packaging**
Address City IN Zip: **2110 Patterson Street, Decatur, IN 46733**
Significant Source Modification Number: **001-36607-00032**
Significant Permit Modification Number: **001-36629-00032**
Reviewer: **Brian Williams**

Unlimited Potential To Emit of the Entire Source (tons/year)										
Emission Unit	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	Total HAPs	Worst Single HAP	
Manufacturing Process	2,120.79	2,116.38	2,116.38	0	0	491.48	0	0.47	0.44	Styrene
Combustion - RTO and Heaters	0.07	0.27	0.27	0.02	3.55	0.20	2.98	0.07	0.06	Hexane
Printing	0	0	0	0	0	9.78	0	0	0	
Total PTE of Entire Source	**2,120.86**	**2,116.65**	**2,116.65**	**0.02**	**3.55**	**501.46**	**2.98**	**0.54**	**0.44**	**Styrene**

Limited Potential To Emit of the Entire Source (tons/year)										
Emission Unit	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	VOC	CO	Total HAPs	Worst Single HAP	
Manufacturing Process	54.74	50.33	50.33	0	0	198.78	0	0.47	0.44	Styrene
Natural Gas Combustion - RTO and Heaters	0.07	0.27	0.27	0.02	3.55	0.20	2.98	0.07	0.06	Hexane
Printing	0	0	0	0	0	9.78	0	0	0	
Total PTE of Entire Source	**54.81**	**50.60**	**50.60**	**0.02**	**3.55**	**208.76**	**2.98**	**0.54**	**0.44**	**Styrene**
PSD Major Source Thresholds	**250**	**250**	**250**	**250**	**250**	**250**	**250**	**NA**	**NA**	

Appendix A: Emission Calculations
Extruder #6 - 2016 Modification

Company Name: **Dolco Packaging**
Address City IN Zip: **2110 Patterson Street, Decatur, IN 46733**
Significant Source Modification Number: **001-36607-00032**
Significant Permit Modification Number: **001-36629-00032**
Reviewer: **Brian Williams**

Polystyrene Manufacturing - Virgin Polystyrene
Limit of material usage before control:

Polystyrene (Virgin + recycled) Maximum =	4,201.12	tons/yr	
Butane Maximum Allowable Usage =	150.85	tons/yr	
Maximum Resin Usage (virgin polystyrene) =	2,828.34	tons/yr	(Recycled polystyrene has no VOC/HAP emissions)

Emitted Into:	Gas Allocation Percentage	Tons per year VOC in this area Before Control	Percent Capture	Percent Destruction Efficiency of TO	Tons Per Year VOC Destroyed	Tons Per Year VOC Emitted
Curing Operation - curing room [a]	13.15%	19.84	100.0%	97.0%	19.24	0.60
Curing Operation - outside storage [a]	4.86%	7.33	0.0%	0.0%	0.00	7.33
Regrind Storage Silos	1.41%	2.13	100.0%	97.0%	2.06	0.06
Extruder Building Area - (Extruder #6)	4.50%	6.79	0.0%	0.0%	0.00	6.79
Thermoforming Building Area	1.53%	2.31	0.0%	0.0%	0.00	2.31
Thermoforming Waste Grinders	15.63%	23.58	100.0%	97.0%	22.87	0.71
Extruder Waste Grinders	3.15%	4.75	100.0%	97.0%	4.61	0.14
Finished Product Storage	10.02%	15.11	0.0%	0.0%	0.00	15.11
Retained in Product	45.75%	69.01	NA	NA	NA	NA
VOC Emissions from Butane Before Control:		**81.83**				

Total Limited VOC Emissions from Butane After Control: **33.05** **tons/yr**

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

HAP Emissions:

HAP	Emission Factor (lb/lb resin)	Emissions (tons/yr)
Styrene	2.59E-05	0.07
Ethyl Benzene	2.10E-06	0.01
Total HAP Emissions		**0.08** **tons/yr**

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

Total Limited VOC Emissions After Control:

Total Emissions from Butane After Control:	**33.05**
Total Emissions from HAPs that are also VOC:	**0.08**
Total VOC:	**33.13**

Appendix A: Emission Calculations
Polystyrene Food Packaging Production Line

Company Name: **Dolco Packaging**
Address City IN Zip: **2110 Patterson Street, Decatur, IN 46733**
Significant Source Modification Number: **001-36607-00032**
Significant Permit Modification Number: **001-36629-00032**
Reviewer: **Brian Williams**

Polystyrene Manufacturing - Virgin Polystyrene
Limit of material usage before control:

Polystyrene (Virgin + recycled) Maximum = 25,204.76 tons/yr
Butane Maximum Allowable Usage = 905.08 tons/yr
Maximum Resin Usage (virgin polystyrene) = 16,961.60 tons/yr (Recycled polystyrene has no VOC/HAP emissions)
67.30% of polystyrene used is virgin

Emitted Into:	Gas Allocation Percentage	Tons per year VOC in this area Before Control	Percent Capture	Percent Destruction Efficiency of TO	Tons Per Year VOC Destroyed	Tons Per Year VOC Emitted
Curing Operation - curing room [a]	13.15%	119.02	100.0%	97.0%	115.45	3.57
Curing Operation - outside storage [a]	4.86%	43.99	0.0%	0.0%	0.00	43.99
Regrind Storage Silos	1.41%	12.76	100.0%	97.0%	12.38	0.38
Extruder Building Area - 6 extruders	4.50%	40.73	0.0%	0.0%	0.00	40.73
Thermoforming Building Area	1.53%	13.85	0.0%	0.0%	0.00	13.85
Thermoforming Waste Grinders	15.63%	141.46	100.0%	97.0%	137.22	4.24
Extruder Waste Grinders	3.15%	28.51	100.0%	97.0%	27.65	0.86
Finished Product Storage	10.02%	90.69	0.0%	0.0%	0.00	90.69
Retained in Product	45.75%	414.07	NA	NA	NA	NA
VOC Emissions from Butane Before Control:		**491.01**				

Total Limited VOC Emissions from Butane After Control: **198.30** **tons/yr**

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

HAP Emissions:

HAP	Emission Factor (lb/lb resin)	Emissions (tons/yr)
Styrene	2.59E-05	0.44
Ethyl Benzene	2.10E-06	0.04
Total HAP Emissions		**0.47** **tons/yr**

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

Total Limited VOC Emissions After Control:

Total Emissions from Butane After Control: **198.30**
Total Emissions from HAPs that are also VOC: **0.47**
Total VOC: **198.78**

PM Emissions from Extruder Grinder, Underpress Grinders, Thermoformers, Recycled Polystyrene Silos, and Day Tanks:

PM emission factors for material handling and transfer are not available. The closest operation Concrete Batching loading (Table 11.12-2) have EF Ratings of E. The uncontrolled PTEs are therefore calculated in reverse, based on filter control efficiencies)

Baghouse Control Efficiency: 99%
Baghouse Controlled Emissions = (2400 acfm) * (0.026 gr/acf) * (60 min/hr) * (lb/7000 grains) * (8,760 hrs/yr) * (ton/2000 lbs) = **2.34 tons/yr**
Total Controlled Emissions from Nine (9) baghouses = (2.34 tons/yr) * (9 baghouses) = **21.08 tons/yr**
Uncontrolled Emissions = (Controlled Emissions) / (1-0.99) = **234.3 tons/yr**
Total Uncontrolled Emissions = Uncontrolled Emissions from one (1) baghouse * 9 baghouses **2,108.4 tons/yr**
Limited PM Emissions = 4.1 * 3.6 (tons/hr)^0.67 = **9.67 pounds per hour**
Limited PM Emissions = **42.36 tons/yr**

Assume PM10 and PM2.5 = PM

Appendix A: Emission Calculations
Talc and Colorator Handling

Company Name: **Dolco Packaging**
Address City IN Zip: **2110 Patterson Street, Decatur, IN 46733**
Significant Source Modification Number: **001-36607-00032**
Significant Permit Modification Number: **001-36629-00032**
Reviewer: **Brian Williams**

Process	Maximum Throughput (lb/hr)	PM Emission Factor (lb/ton)	Potential PM Emissions (lb/hr)	Potential PM Emissions (ton/yr)	PM10 Emission Factor (lb/ton)	Potential PM10 Emissions (lb/hr)	Potential PM10 Emissions (ton/yr)
Virgin Pellet Silo*	3,873	0.73	1.41	6.19	0.47	0.91	3.99
Virgin Pellet Silo*	3,873	0.73	1.41	6.19	0.47	0.91	3.99
Total				**12.38**			**7.97**

Methodology
*Virgin pellets directly charged into silo via truck feed line and uncontrolled.
Emission Factors are from US EPA AP-42, Chapter 11.12 - Concrete Batching,
Table 11.12-2, Cement unloading to elevated storage silo (SCC 3-05-011-17)
Emissions (lb/hr) = Maximum Throughput (lb/hr) * EF (lb/ton) / 2,000 (lb/ton)
Emissions (ton/yr) = Emissions (lb/hr) * 8,760 (hr/yr) * 1/2,000 (ton/lb)

Appendix A: Emission Calculations
Talc and Colorator Handling

Company Name: **Dolco Packaging**
Address City IN Zip: **2110 Patterson Street, Decatur, IN 46733**
Significant Source Modification Number: **001-36607-00032**
Significant Permit Modification Number: **001-36629-00032**
Reviewer: **Brian Williams**

Process	Maximum Throughput (lb/hr)	PM Emission Factor (lb/1,000 lb)***	Potential PM Emissions (lb/hr)	Potential PM Emissions (ton/yr)
Extruder feed containers for talc*	29.52	0.00049	1.45E-05	6.34E-05
Extruder feed containers for colorator**	6.5	0.00049	3.19E-06	1.40E-05
Total				**7.73E-05**

Methodology
*Talc is manually fed into containers and is uncontrolled.
**Pellets manually fed into containers and is uncotrolled.
PM Emission Factor is from US EPA AP-42, Chapter 11.26 - Talc Processing, Table 11.26-1 - Crushed Talc Railcar Loading (SCC 3-05-089-12)
***Assumes PM10 and PM2.5 = PM
PM Emissions (lb/hr) = Maximum Throughput (lb/hr) * PM EF (lb/1,000 lb) / 1,000
PM Emissions (ton/yr) = PM Emissions (lb/hr) * 8,760 (hr/yr) * 1/2,000 (ton/lb)

Appendix A: Emission Calculations
Natural Gas Combustion (RTO and Heaters)

Company Name: **Dolco Packaging**
Address City IN Zip: **2110 Patterson Street, Decatur, IN 46733**
Significant Source Modification Number: **001-36607-00032**
Significant Permit Modification Number: **001-36629-00032**
Reviewer: **Brian Williams**

Heat Input Capacity MMBtu/hr	HHV MMBtu/MMscf	Potential Throughput MMCF/yr
8.27	1020	71.0

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.07	0.27	0.27	0.02	3.55	0.20	2.98

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

Methodology

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

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	7.458E-05	4.261E-05	2.663E-03	6.392E-02	1.207E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.776E-05	3.906E-05	4.972E-05	1.349E-05	7.458E-05

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

Total HAP	**6.702E-02**

Appendix A: Emission Calculations
Printing Operations

Company Name: **Dolco Packaging**
Address City IN Zip: **2110 Patterson Street, Decatur, IN 46733**
Significant Source Modification Number: **001-36607-00032**
Significant Permit Modification Number: **001-36629-00032**
Reviewer: **Brian Williams**

Ten (10) Offset Printers

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

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

Methodology:

Oil based Ink VOC emissions (tons/year) = usage rate (lbs/yr) * % VOC content * emission factor * ton/2000 lb
UV curable Ink VOC emissions (tons/year) = usage rate (lbs/yr) * % VOC content * ton/2000 lb
Solvent VOC emissions (ton/year) = usage rate (gals/yr) * % VOC content * density (lb/gal) * ton/2000 lb

Emission Factor:

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

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

February 10, 2016
Dolco Packaging
001-36607-00032 & 001-36629-00032

Dear Concerned Citizen(s):

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

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

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

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

Enclosure
PN AAA Cover.dot 8/27/2015

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AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

February 10, 2016

A 30-day public comment period has been initiated for:

Permit Number: **001-36607-00032 & 001-36629-00032**
Applicant Name: **Dolco Packaging**
Location: **Decatur, Adams County, Indiana**

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:
http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification.dot 8/27/2015

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February 10, 2016

Mr. Richard Schroeder
Dolco Packaging
2110 Patterson Street
Decatur, IN 46733

Re: Public Notice
Dolco Packaging
Permit Level: Significant Source Modification & Significant Permit Modification/Revision
Permit Number: 001-36607-00032 & 001-36629-00032

Dear Mr. Schroeder:

Enclosed is a copy of your draft Significant Source Modification, Significant Permit Modification/Revision, 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 Decatur Daily Democrat in Decatur, Indiana publish the abbreviated version of the public notice no later than February 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 Adams Public Library, 128 South 3rd Street in Decatur, Indiana. 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 Brian Williams, 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 4-5375 or dial (317) 234-5375.

Sincerely,

Greg Hotopp

Greg Hotopp
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 8/27/2015

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Governor

Carol S. Comer
Commissioner

February 10, 2016

To: Adams Public Library

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: Dolco Packaging
Permit Number: 001-36607-00032 & 001-36629-00032

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 8/27/2015

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Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

February 10, 2016

Decatur Daily Democrat
141 South Second Street
PO Box 1001
Decatur, IN 46733

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Dolco Packaging, Adams 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 February 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 Greg Hotopp at 800-451-6027 and ask for extension 4-3493 or dial 317-234-3493.

Sincerely,

Greg Hotopp

Greg Hotopp
Permit Branch
Office of Air Quality

Permit Level: Significant Source Modification & Significant Permit Modification/Revision
Permit Number: 001-36607-00032 & 01-36629-00032

Enclosure

PN Newspaper.dot 8/27/2015

Mail Code 61-53

IDEM Staff	GHOTOPP 2/10/2016 Dolco Packaging 001-36607/36629-00032 Draft			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Richard Schroeder Dolco Packaging 2110 Patterson Street Decatur IN 46733 (Source CAATS)									
2		Jim Baumgartner Plant Manager Dolco Packaging 2110 Patterson Street Decatur IN 46733 *(RO CAATS)*									
3		Adams County Commissioners 313 West Jefferson Street Decatur IN 46733 *(Local Official)*									
4		Adams County Health Department County Svcs Complex, 313 W. Jefferson # 314 Decatur IN 46733-1673 *(Health Department)*									
5		Decatur Public Library 128 S 3rd St Decatur IN 46733-1691 *(Library)*									
6		Mr. Phil Estridge 6651 S Greensboro Pike Knightstown IN 46148 *(Affected Party)*									
7		Decatur City Council and Mayors Office 225 W. Monroe St. Decatur IN 46733 *(Local Official)*									
8		Larry Bernson Environmental Consulting, Inc. 17 Glen Hook Road Hillsdale NJ 07642 *(Consultant)*									
9											
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