



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 the Renewal of a
Part 70 Operating Permit

for Dolco Packaging in Adams County

Part 70 Operating Permit Renewal No.: T001-36966-00032

The Indiana Department of Environmental Management (IDEM) has received an application from Dolco Packaging located at 2110 Patterson Street, Decatur, Indiana for a renewal of its Part 70 Operating Permit issued on December 29, 2011. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Dolco Packaging to continue to operate its existing source.

This draft Part 70 Renewal does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

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

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 T001-36966-00032 in all correspondence.

Comments should be sent to:

Jean Fix
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-8531
Or dial directly: (317) 234-8531
Fax: (317) 232-6749 attn: Jean Fix
E-mail: jfix@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 Jean Fix or my staff at the above address.


Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality



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DRAFT

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

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

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T001-36966-00032	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(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 (Plastic Foam Products)
County Location:	Adams
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(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, collectively identified as unit 101, with a maximum throughput of 5,754.51 pounds of virgin and recycled polystyrene per hour and a maximum capacity of 206.64 pounds of butane blowing agent per hour, and consisting of the following:
 - (1) Two (2) virgin pellet silos, constructed in 1972, with virgin pellets directly charged into the silo via a truck feed line, each with a total maximum throughput of 3,873 pounds of pellets per hour, uncontrolled, and exhausting to the indoors.
 - (2) Six (6) polystyrene foam extruders, with VOC emissions uncontrolled and exhausting to the indoors, consisting of the following:

Emission Unit ID	Construction Date	Maximum Polystyrene Throughput (lbs/hr)	Maximum Butane Blowing Agent Usage (lbs/hr)
E-1	1971	1,200	34.44
E-2	1971	1,200	34.44
E-3	1977	1,200	34.44
E-4	1974	1,200	34.44
E-5	2011	1,200	34.44
E-6	approved in 2016 for construction	1,200	34.44

- (3) 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 reuse, with VOC and particulate emissions directed to silo baghouses for particulate control, and then to a pre-filter prior to the regenerative thermal oxidizer (RTO) for VOC control.

- (4) One (1) curing room, constructed in 1997, equipped with one (1) natural gas fired regenerative thermal oxidizer (RTO), constructed in 1998, with a maximum capacity of two (2) million British thermal units per hour, exhausting through a stack to the atmosphere.
- (5) One (1) outside storage curing area, constructed in 1972, with VOC emissions uncontrolled.
- (6) Eleven (11) thermoformers, identified as #1-#11 Irwin, with VOC uncontrolled and exhausting to the indoors, consisting of the following.

Emission Unit ID	Construction Date	Maximum Polystyrene Throughput (lbs/hr)
#1 Irwin	1975	457.2
#2 Irwin	2000	410.1
#3 Irwin	1998	684.5
#4 Irwin	2000	410.1
#5 Irwin	1997	731.5
#6 Irwin	1998	410.1
#7 Irwin	2000	731.5
#8 Irwin	1974	410.1
#9 Irwin	2009	992.1
#10 Irwin	2016	992.1
#11 Irwin	2016	410.1

- (7) Eleven (11) underpress grinders, identified as #1-#11 Trim, 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 for particulate control and then a pre-filter prior to the regenerative thermal oxidizer (RTO) for VOC control, consisting of the following:

Emission Unit ID	Construction Date	Maximum Polystyrene Throughput (lbs/hr)
#1 Trim	1999	500
#2 Trim	1998	900
#3 Trim	1998	900
#4 Trim	1979	900
#5 Trim	1997	900
#6 Trim	1977	900
#7 Trim	2000	900
#8 Trim	1977	900
#9 Trim	2009	900
#10 Trim	2016	900
#11 Trim	2016	500

- (8) Nine (9) silos for regrind flake recycling, identified as #2-#9 Side Grinder and Ext. Grinder, constructed in 1972, with a total maximum throughput of 1,882 pounds per hour, each equipped with a baghouse for particulate control and then a pre-filter prior to the regenerative thermal oxidizer (RTO) for VOC control.
- (9) Finished product storage, constructed in 1972, where finished egg cartons are stored until they are shipped offsite, with VOC emissions uncontrolled and exhausting to the indoors.

- (b) Ten (10) offset printers, collectively identified as unit 102, 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, identified as printers 1-8, constructed in 1972,
 - (2) One (1) offset printer, identified as printer 9, constructed in 2010, and
 - (3) One (1) offset printer, identified as printer 10, approved in 2015 for construction.

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

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

The source also consists of the following insignificant activities:

- (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, SO₂, NO_x, 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) Six (6) extruder feed containers for talc, with a maximum throughput of 29.52 pounds per hour, uncontrolled, and exhausting to the indoors.
 - (4) Six (6) extruder feed containers for colorator, with a maximum throughput of 6.5 pounds per hour, uncontrolled, and exhausting to the indoors.
 - (5) Eight (8) day tanks for material handling and transfer, identified as BH-1 through BH-8, with a total maximum throughput of 5,755 pounds per hour, venting through baghouses when filling, exhausting to the outdoors.
 - (6) Cured rollstock operations associated with processing of polystyrene foam shipped from outside.

- (7) Repelletizer installed in 1994, with a capacity of 500 lbs/hr.
- (g) Natural gas-fired combustion sources, collectively identified as unit 103, 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, constructed in 2005, each with a maximum heat input capacity of 0.28 MMBtu/hr, uncontrolled, and exhausting to the outdoors.
 - (2) One (1) natural gas-fired heater, identified as Heater Unit 10, constructed in 2005, 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, constructed in 1994, 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, constructed in 1994, 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 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, T001-36966-00032, 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.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.4 Enforceability [326 IAC 2-7-7][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.5 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.6 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.7 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.8 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(35), 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(35).

B.9 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. All 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(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

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

The Permittee shall implement the PMPs.

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

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.11 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(35).

- (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.12 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.13 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 T001-36966-00032 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 permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 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.15 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(35).

- (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.16 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(42). 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(35).

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.17 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(35).

(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.18 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.19 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)(1) and (c)(1). 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(37)) 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(35).

- (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.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 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.22 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(35).

- (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.23 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.24 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 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.7 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of

326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

no later than thirty-five (35) days prior to the intended test date. 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(35).

- (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(35).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

- (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(35).

- (c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

C.11 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.12 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 maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) 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.13 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.14 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5][326 IAC 2-7-6]

- (I) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, 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.
- (II)
 - (a) *CAM Response to excursions or exceedances.*
 - (1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the 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 emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized

distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (2) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
- (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
- (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a Quality Improvement Plan (QIP). The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.
- (d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).
- (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
- (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(c) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
 - (1) Failed to address the cause of the control device performance problems; or
 - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
- (h) *CAM recordkeeping requirements.*
 - (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(c) of this condition

and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

- (2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

C.15 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(35).

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

C.16 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(35).

C.17 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.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11] [40 CFR 64][326 IAC 3-8]

- (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(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

- (1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

- (2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

- (b) The address for report submittal is:

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

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

Stratospheric Ozone Protection

C.19 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, collectively identified as unit 101, with a maximum throughput of 5,754.51 pounds of virgin and recycled polystyrene per hour and a maximum capacity of 206.64 pounds of butane blowing agent per hour, and consisting of the following:

- (1) Two (2) virgin pellet silos, constructed in 1972, with virgin pellets directly charged into the silo via a truck feed line, each with a total maximum throughput of 3,873 pounds of pellets per hour, uncontrolled, and exhausting to the indoors.
- (2) Six (6) polystyrene foam extruders, with VOC emissions uncontrolled and exhausting to the indoors, consisting of the following:

Emission Unit ID	Construction Date	Maximum Polystyrene Throughput (lbs/hr)	Maximum Butane Blowing Agent Usage (lbs/hr)
E-1	1971	1,200	34.44
E-2	1971	1,200	34.44
E-3	1977	1,200	34.44
E-4	1974	1,200	34.44
E-5	2011	1,200	34.44
E-6	approved in 2016 for construction	1,200	34.44

- (3) 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 reuse, with VOC and particulate emissions directed to silo baghouses for particulate control and then a pre-filter prior to the regenerative thermal oxidizer (RTO) for VOC control.
- (4) One (1) curing room, constructed in 1997, equipped with one (1) natural gas fired regenerative thermal oxidizer (RTO), constructed in 1998, with a maximum capacity of two (2) million British thermal units per hour, exhausting through a stack to the atmosphere.
- (5) One (1) outside storage curing area, constructed in 1972, with VOC emissions uncontrolled.
- (6) Eleven (11) thermoformers, identified as #1-#11 Irwin, with VOC uncontrolled and exhausting to the indoors, consisting of the following.

Emission Unit ID	Construction Date	Maximum Polystyrene Throughput (lbs/hr)
#1 Irwin	1975	457.2
#2 Irwin	2000	410.1
#3 Irwin	1998	684.5
#4 Irwin	2000	410.1
#5 Irwin	1997	731.5
#6 Irwin	1998	410.1
#7 Irwin	2000	731.5
#8 Irwin	1974	410.1
#9 Irwin	2009	992.1
#10 Irwin	2016	992.1
#11 Irwin	2016	410.1

- (7) Eleven (11) underpress grinders, identified as #1-#11 Trim, 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 for particulate control and then a pre-filter prior to the regenerative thermal oxidizer (RTO) for VOC control, consisting of the following:

Emission Unit ID	Construction Date	Maximum Polystyrene Throughput (lbs/hr)
#1 Trim	1999	500
#2 Trim	1998	900
#3 Trim	1998	900
#4 Trim	1979	900
#5 Trim	1997	900
#6 Trim	1977	900
#7 Trim	2000	900
#8 Trim	1977	900
#9 Trim	2009	900
#10 Trim	2016	900
#11 Trim	2016	500

- (8) Nine (9) silos for regrind flake recycling, identified as #2-#9 Side Grinder and Ext. Grinder, constructed in 1972, with a total maximum throughput of 1,882 pounds per hour, each equipped with a baghouse for particulate control and then a pre-filter prior to the regenerative thermal oxidizer (RTO) for VOC control.
- (9) Finished product storage, constructed in 1972, where finished egg cartons are stored until they are shipped offsite, with VOC emissions uncontrolled and exhausting to the indoors

(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 food packaging production line, 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
Outside Storage Curing Area	NA	4.86
Silos for regrind flake recycling (#2-#9 Side Grinder and Ext. Grinder)	RTO	1.41
Extruders (E-1 through E-6)	NA	4.5
Thermoformers (#1-#11 Irwin)	NA	1.53
Underpress grinders (#1-#11 Trim)	RTO	15.63
Extruder Waste Grinder	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 the following capture efficiency of 100% for curing room emissions, 100% for the thermoforming waste grinders, 100% for extruder waste grinder, 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, consisting of the extruder waste grinder, eleven (11) underpress grinders and nine (9) silos for regrind flake, controlled by nine (9) baghouses, shall not exceed a combined total of 9.67 pounds per hour.
- (e) The PM10 emissions from the polystyrene food packaging production line, consisting of the extruder waste grinder, eleven (11) underpress grinders and nine (9) silos for regrind flake, controlled by nine (9) baghouses, shall not exceed a combined total of 9.67 pounds per hour.
- (f) The PM2.5 emissions from the polystyrene food packaging production line, consisting of the extruder waste grinder, eleven (11) underpress grinders and nine (9) silos for regrind flake, controlled by nine (9) baghouses, shall not exceed a combined total of 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 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (BACT) and Part 70 Operating Permit Renewal No. 001-36966-00032, the Best Available Control Technology (BACT) for the curing room shall be the following:

- (a) The VOC emissions from the curing room shall not exceed 2.38 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.
- (b) The VOC emissions from the curing room shall be controlled by the regenerative thermal oxidizer (RTO). The RTO shall have a minimum destruction efficiency of 98%.

- (c) The capture systems for the curing room shall have a minimum capture efficiency of 100%.

Compliance with this condition shall satisfy the requirements of 326 IAC 8-1-6 (General Reduction Requirements).

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 pellet 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:

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

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

A Preventive Maintenance Plan is required for this facility and its control device. 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 Volatile Organic Compound (VOC)

In order to comply with Conditions D.1.1 (a) to (c) and D.1.2, the RTO shall control emissions from the following, at all times that the process is in operation:

Curing Room
Silos for regrind flake recycling (#2-#9 Side Grinder and Ext. Grinder)
Underpress grinders (#1-#11 Trim)
Extruder Waste Grinder

D.1.6 Particulate Control

- (a) In order to comply with Conditions D.1.1 (d) to (f) and D.1.3, the nine (9) silo baghouses and 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.1.7 Testing Requirements [326 IAC 2-7-6(1)(6)] [326 IAC 2-1.1-11] [326 IAC 8-1-6]

In order to demonstrate compliance with Conditions D.1.1(a) to (c) and D.1.2, the Permittee shall perform VOC (including emission rate, destruction efficiency, and capture efficiency) testing on the thermal oxidizer (RTO) while all units associated with the one (1) polystyrene food packaging production line are in operation, utilizing methods as approved by the Commissioner and shall be repeated at least once every five (5) years from the date of the most recent 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.1.8 Thermal Oxidizer Temperature [40 CFR 64]

Pursuant to 40 CFR 64:

- (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 block average.
- (b) The Permittee shall determine the hourly block average temperature from the most recent valid stack test that demonstrates compliance with Condition D.1.1(a) to (c) 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 block 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.1.9 Parametric Monitoring [40 CFR 64]

Pursuant to 40 CFR 64:

- (a) The Permittee shall determine the RTO fan Hertz from the most recent valid stack test that demonstrates compliance with Conditions D.1.1 (a) to (c) 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 (1) reading, the fan Hertz is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is between 41 and 43 Hertz or the range unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. 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 above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.1.10 Visible Emissions Notations [40 CFR 64]

Pursuant to 40 CFR 64:

- (a) Visible emission notations of the RTO stack exhaust (due to baghouses and pre-filter exhausting through the same stack) 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.1.11 Parametric Monitoring [40 CFR 64]

Pursuant to 40 CFR 64, the Permittee shall record the pressure drop across the RTO pre-filter 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 (1) reading, the pressure drop across the pre-filter is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 1.0 and 3.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. 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.1.12 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.1.13 Record Keeping Requirement

- (a) To document the compliance status with Conditions D.1.1(a) to (c), 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 compliance status with Condition D.1.2, the Permittee shall maintain monthly records of the VOC emissions from the curing room.
- (c) To document the compliance status with Condition D.1.8, the Permittee shall maintain the continuous temperature records (on an hourly block average basis) for the regenerative thermal oxidizer (RTO) and the hourly block average temperature used to demonstrate compliance during the most recent compliance stack test.
- (d) To document the compliance status with Condition D.1.9, the Permittee shall maintain daily records of the RTO fan Hertz.
- (e) To document the compliance status with Condition D.1.10, the Permittee shall maintain records of once per day visible emission notations of the regenerative thermal oxidizer (RTO) stack exhaust (due to baghouses and the RTO pre-filter exhausting through the same stack) 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).
- (f) To document the compliance status with Condition D.1.11, the Permittee shall maintain records of three (3) times per day of the pressure drop across the RTO pre-filter. 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).
- (g) Section C - General Record Keeping Requirements, contains the Permittee's obligations with regard to the records required by this condition.

D.1.14 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 using the reporting forms located at the end of this permit, or their equivalent no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by the "responsible official," as defined by 326 IAC 2-7-1(35).

**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.: T001-36966-00032

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.: T001-36966-00032

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) daytime 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.: T001-36966-00032
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. (Section D.1.1 (a))

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.: T001-36966-00032
Facility: Polystyrene food packaging production line
Parameter: VOC emissions from the curing room
Limit: The VOC emissions from the curing room shall not exceed 2.38 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. (Section D.1.2 (a))

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.: T001-36966-00032

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
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:	
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: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Dolco Packaging
Source Location:	2110 Patterson Street, Decatur, Indiana 46733
County:	Adams
SIC Code:	3086 (Plastics Foam Products)
Permit Renewal No.:	T001-36966-00032
Permit Reviewer:	Jean Fix

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Dolco Packaging relating to the operation of a stationary polystyrene extrusion plant. On March 17, 2016, Dolco Packaging submitted an application to the OAQ requesting to renew its operating permit. Dolco Packaging was issued its first Part 70 Operating Permit (T001-30927-00032) on December 29, 2011.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) polystyrene food packaging production line, collectively identified as unit 101, with a maximum throughput of 5,754.51 pounds of virgin and recycled polystyrene per hour and a maximum capacity of 206.64 pounds of butane blowing agent per hour, and consisting of the following:
- (1) Two (2) virgin pellet silos, constructed in 1972, with virgin pellets directly charged into the silo via a truck feed line, each with a total maximum throughput of 3,873 pounds of pellets per hour, uncontrolled, and exhausting to the indoors.
- The descriptions for the two (2) virgin pellet silos have been moved from the insignificant activities in the permit. These units represent a significant step in the polystyrene food packaging production line, collectively identified as unit 101, and are included in state requirements affecting this production line.
- (2) Six (6) polystyrene foam extruders, with VOC emissions uncontrolled and exhausting to the indoors, consisting of the following:

Emission Unit ID	Construction Date	Maximum Polystyrene Throughput (lbs/hr)	Maximum Butane Blowing Agent Usage (lbs/hr)
E-1	1971	1,200	34.44
E-2	1971	1,200	34.44
E-3	1977	1,200	34.44
E-4	1974	1,200	34.44
E-5	2011	1,200	34.44
E-6	approved in 2016 for construction	1,200	34.44

At the time of Part 70 Permit Renewal T001-36966-00032, the polystyrene foam extruder #6, approved in 2016 for construction, is not yet in service, expected receipt of the unit in July 2016, and unit in service by late August 2016.

- (3) 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 reuse, with VOC and particulate emissions directed to silo baghouses for particulate control and then a pre-filter prior to the regenerative thermal oxidizer (RTO) for VOC control.
- (4) One (1) curing room, constructed in 1997, equipped with one (1) natural gas fired regenerative thermal oxidizer (RTO), constructed in 1998, with a maximum capacity of two (2) million British thermal units per hour, exhausting through a stack to the atmosphere.
- (5) One (1) outside storage curing area, constructed in 1972, with VOC emissions uncontrolled.
- (6) Eleven (11) thermoformers, identified as #1-#11 Irwin, with VOC uncontrolled and exhausting to the indoors, consisting of the following.

Emission Unit ID	Construction Date	Maximum Polystyrene Throughput (lbs/hr)
#1 Irwin	1975	457.2
#2 Irwin	2000	410.1
#3 Irwin	1998	684.5
#4 Irwin	2000	410.1
#5 Irwin	1997	731.5
#6 Irwin	1998	410.1
#7 Irwin	2000	731.5
#8 Irwin	1974	410.1
#9 Irwin	2009	992.1
#10 Irwin	2016	992.1
#11 Irwin	2016	410.1

This renewal listed each thermoformer with its construction date and maximum capacity.

- (7) Eleven (11) underpress grinders, identified as #1-#11 Trim, 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 for particulate control and then a pre-filter prior to the regenerative thermal oxidizer (RTO) for VOC control, consisting of the following:

Emission Unit ID	Construction Date	Maximum Polystyrene Throughput (lbs/hr)
#1 Trim	1999	500
#2 Trim	1998	900
#3 Trim	1998	900
#4 Trim	1979	900
#5 Trim	1997	900
#6 Trim	1977	900
#7 Trim	2000	900
#8 Trim	1977	900
#9 Trim	2009	900
#10 Trim	2016	900
#11 Trim	2016	500

This renewal listed each grinder with its construction date and maximum capacity.

- (8) Nine (9) silos for regrind flake recycling, identified as #2-#9 Side Grinder and Ext. Grinder, constructed in 1972, with a total maximum throughput of 1,882 pounds per hour, each equipped with a baghouse for particulate control and then a pre-filter prior to the regenerative thermal oxidizer (RTO) for VOC control.

The descriptions for the nine (9) silos for regrind flake recycling have been moved from the insignificant activities in the permit. These units represent a significant step in the polystyrene food packaging production line, collectively identified as unit 101, and are included in state requirements affecting this production line.

- (9) Finished product storage, constructed in 1972, where finished egg cartons are stored until they are shipped offsite, with VOC emissions uncontrolled and exhausting to the indoors.

A description for finished product storage, where egg cartons are stored before they are shipped offsite has been added to the emission units. This unit is a significant step in the polystyrene food packaging production line and is included in state requirements affecting this production line.

- (b) Ten (10) offset printers, collectively identified as unit 102, 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, identified as printers 1-8, constructed in 1972,
 - (2) One (1) offset printer, identified as printer 9, constructed in 2010, and
 - (3) One (1) offset printer, identified as printer 10, approved in 2015 for construction.

At the time of Part 70 Permit Renewal T001-36966-00032, the one (1) offset printer 10, approved in 2015 for construction, is not yet in service; however, unit has been purchased.

Insignificant Activities

The source also consists of the following insignificant activities:

- (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, SO₂, NO_x, 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) Six (6) extruder feed containers for talc, with a maximum throughput of 29.52 pounds per hour, uncontrolled, and exhausting to the indoors.
 - (4) Six (6) extruder feed containers for colorator, with a maximum throughput of 6.5 pounds per hour, uncontrolled, and exhausting to the indoors.
 - (5) Eight (8) day tanks for material handling and transfer, identified as BH-1 through BH-8, with a total maximum throughput of 5,755 pounds per hour, venting through baghouses when filling, exhausting to the outdoors.
 - (6) Cured rollstock operations associated with processing of polystyrene foam shipped from outside.
 - (7) Repelletizer installed in 1994, with a capacity of 500 lbs/hr.
- (g) Natural gas-fired combustion sources, collectively identified as unit 103, 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, constructed in 2005, each with a maximum heat input capacity of 0.28 MMBtu/hr, uncontrolled, and exhausting to the outdoors.
 - (2) One (1) natural gas-fired heater, identified as Heater Unit 10, constructed in 2005, 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, constructed in 1994, 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, constructed in 1994, each with a maximum heat input capacity of 0.50 MMBtu/hr, uncontrolled, and exhausting to the outdoors.

Existing Approvals

Since the issuance of the Part 70 Operating Permit (001-30927-00032) on December 29, 2011, the source has constructed or has been operating under the following additional approvals:

- (a) Administrative Amendment No. 011-36352-00032, issued on November 4, 2015; and
- (b) Significant Permit Modification No. 001-36629-00032, issued on April 4, 2016.

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in 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.

¹Unclassifiable 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}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) 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.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions

Pollutant	Tons/year
PM	2,120.86
PM ₁₀	2,116.65
PM _{2.5}	2,116.65
SO ₂	0.02
NO _x	3.55
VOC	501.46
CO	2.98
Single HAP	0.44
Total HAP	0.54

HAPs	tons/year
Styrene	0.44
Ethyl Benzene	0.04
Hexane	0.064
Total	0.544

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of PM₁₀, PM_{2.5} and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (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 GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Polystyrene 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
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant". **PM _{2.5} listed is direct PM _{2.5} .									

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
- (c) These emissions are based upon Appendix A of this document.

Federal Rule Applicability

Compliance Assurance Monitoring (CAM)

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:
- (1) has a potential to emit before controls equal to or greater than the 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 existing emission unit and specified pollutant subject to CAM:

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 2-2 326 IAC 8-1-6	>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	N	-
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 and underpress grinders for VOC. A CAM plan has been submitted and the Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements.

New Source Performance Standards (NSPS)

- (b) 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 still not included in the permit for the polystyrene food packaging production line because the source does not manufacture polypropylene, polyethylene, polystyrene, or poly (ethylene terephthalate) as defined in 40 CFR Part 60.561.
- (c) The requirements of the NSPS, 40 CFR Part 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984) are still not included in the permit for the insignificant storage tanks at this source because each storage tank has a capacity of less than 75 cubic meters.
- (d) There are no New Source Performance Standards (NSPS) (40 CFR Part 60 and 326 IAC 12) applicable to this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (e) 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 still not included in the permit for the polystyrene food packaging production line, since this source does not produce flexible polyurethane foam or rebound foam and is not a major source of HAPs.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Flexible Polyurethane Foam Fabrication Operations, 40 CFR Part 63, Subpart M (326 IAC 20-66), are still not included in the permit for the polystyrene food packaging production line, since this source does not operate a flexible polyurethane foam fabrication plant and is not a major source of HAPs.
- (g) 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 OOOOO (326 IAC 20), are still not included in the permit for the polystyrene food packaging production line, 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.
- (h) 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 permit renewal.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is subject to 326 IAC 1-6-3.

The condition description (Section D.1.3) has been updated to current IDEM standard language.

326 IAC 2-2 (Prevention of Significant Deterioration)

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.
- (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
Outside Storage Curing Area	NA	4.86
Silos for regrind flake recycling (#2-#9 Side Grinder and Ext. Grinder)	RTO	1.41
Extruders (E-1 through E-6)	NA	4.50
Thermoformers (#1-#11 Irwin)	NA	1.53
Underpress grinders (#1-#11 Trim)	RTO	15.63
Extruder Waste Grinder	RTO	3.15
Finished Product Storage	NA	10.02

(The emissions units have been revised to be the consistent with the descriptions of the units.)

- (c) The Permittee shall operate the thermal oxidizer, with a minimum destruction efficiency of 97% and the following 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.

(It has to be noted that this existing minimum destruction efficiency is lower than the new requirement for the curing room pursuant to 326 IAC 8-1-6. Details of the BACT for the curing room are below.)

- (d) The PM emissions from the polystyrene food packaging production line, consisting of the extruder waste grinder, eleven (11) underpress grinders and nine (9) silos for regrind flake, controlled by nine (9) baghouses, shall not exceed a combined total of 9.67 pounds per hour.
- (e) The PM10 emissions from the polystyrene food packaging production line, consisting of the extruder waste grinder, eleven (11) underpress grinders and nine (9) silos for regrind flake, controlled by nine (9) baghouses, shall not exceed a combined total of 9.67 pounds per hour.
- (f) The PM2.5 emissions from the polystyrene food packaging production line, consisting of the extruder waste grinder, eleven (11) underpress grinders and nine (9) silos for regrind flake, controlled by nine (9) baghouses, shall not exceed a combined total of 9.67 pounds per hour.

These are existing limits that are not being revised.

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.

326 IAC 2-6 (Emission Reporting)

This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM10 is less than 250 tons per year; and the potential to emit of CO, NOx, and SO2 is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1, 2017 and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Certification)

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.

326 IAC 5-1 (Opacity Limitations)

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

326 IAC 6.5 PM Limitations Except Lake County

This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

State Rule Applicability – Individual Facilities

Polystyrene food packaging production line, collectively identified as unit 101

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

The polystyrene food packaging production line of this facility 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 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) Pursuant to 326 IAC 6-3-2, 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 pellet silo shall not exceed 6.39 pounds per hour when operating at a process weight rate of 1.94 tons per hour, each.

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

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

P = process weight rate in tons per hour

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

Each of the two (2) virgin pellet silos have a PM PTE of 1.41 pounds per hour and therefore would not need a control device in order to comply with the limit.

These are existing limits that are not being revised.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
 IDEM, OAQ has performed an official 326 IAC 8-1-6 Best Available Control Technology (BACT) determination of all the units associated with the existing polystyrene food packaging production line. Details may be found below and in Appendix B of this document.

- (1) The 326 IAC 8-1-6 (BACT) VOC avoidance limit requirements for the Extruder #5 have been removed from the permit. IDEM has determined Extruder #5 was never subject to the rule because the VOC potential emissions are less than 25 tons per year and the original justification for the rule is determined to be unfounded since the source has confirmed that excess butane cannot be pumped into the extrusion process. This is a Title 1 change.
- (2) A determination was made that the curing room, constructed in 1997 is subject to the rule.

IDEM, OAQ has reviewed of the processes associated with the existing polystyrene food packaging production line and has determined that the extruders, curing operations, thermoformers, grinders, and silos operate independently of each other. Therefore, IDEM has performed the following reevaluation of the applicability of 326 IAC 8-1-6 for the emission units that make up the polystyrene food packaging production line.

Emission Unit	Construction Date	Unlimited VOC PTE (tons/year)	326 IAC 8-1-6 Applicable (Y/N)
Two (2) Virgin Pellet Silos	1972	0	N
Extruder (E-1 through E6)	1971 - 2016	<25, each	N
Extruder Waste Grinder	1972	<25	N
Curing Operation - Curing Room	1997	>25	Y
Curing Operation - Outside Storage	1972	>25	N
Thermoformers (#1 - #11 Irwin)	1974 - 2016	<25, each	N
Underpress Grinders (#1 - #11 Trim)	1977 - 2016	<25, each	N
Nine (9) Regrind Silos	1972	<25, each	N

Based on the table above, the curing room, constructed in 1997, is subject to the requirements of 326 IAC 8-1-6, because it was constructed after January 1, 1980 and has an unlimited potential to emit greater than twenty-five (25) tons of VOC per year. The VOC emissions from the curing room are currently controlled by a regenerative thermal oxidizer (RTO) that was constructed in 1998.

The following are the detailed BACT requirements:

Pursuant to 326 IAC 8-1-6 and Part 70 Operating Permit Renewal No. 001-36966-00032, the Best Available Control Technology (BACT) for the curing room shall be the following:

- (a) The VOC emissions from the curing room shall not exceed 2.38 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

The VOC emissions after control were determined as follows:

$$\text{VOC Emissions (tons/year)} = 905.08 \text{ tons butane/year} \times 13.15 \text{ lbs of VOC emitted/100 lbs of butane used} \times (1 - 98\% \text{ overall control efficiency/100})$$

- (b) The VOC emissions from the curing room shall be controlled by the regenerative thermal oxidizer (RTO). The RTO shall have a minimum destruction efficiency of 98%.

(It has to be noted that this minimum destruction efficiency is higher than the existing requirement for the curing room to render 326 IAC 2-2 not applicable.)

- (c) The capture systems for the curing room shall have a minimum capture efficiency of 100%.

This is a new requirement added to the permit due to the reevaluation of 326 IAC 8-1-6 (BACT).

The requirements of 326 IAC 8-1-6 are not applicable to any of the other emission units because they were either constructed before January 1, 1980, which is the applicability date for 326 IAC 8-1-6 or they were constructed after January 1, 1980 and have an unlimited potential to emit less than twenty-five (25) tons of VOC per year.

Therefore, after reevaluating the rule, IDEM has determined that the Extruder #E-5 is no longer subject to the VOC avoidance limit requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from Extruder #E-5 is less than twenty-five (25) tons per year, the previous justification for adding this unit is unfounded, and the similar Extruder #E-6 is not subject.

Pursuant to Part 70 permit T001-30927-00032, issued December 29, 2011:

"The new extruder has maximum uncontrolled VOC emissions of 6.8 tons per year, with maximum operational annual butane usage of 150.9 tons. Usable product cannot be manufactured if excess butane is used. However, it is possible for excess butane to be pumped into the extrusion process, leading to additional emissions of butane. Therefore, a butane usage limitation of 151 tons per twelve (12) consecutive month period has been included in the permit".

This justification is unfounded since the source has confirmed that no excess butane can be added to the extrusion process.

Pursuant to Significant Permit Modification 001-36629-00032, issued April 4, 2016, a new Extruder unit #E-6 (similar to Extruder #E-5) was found to be not subject to the rule because the its unlimited VOC potential emissions is less than 25 tons per year.

Therefore, the requirements for 326 IAC 8-1-6 for the Extruder #5 are being removed from this permit renewal. This is a Title 1 change.

Printers, collectively identified as unit 102

326 IAC 8-6 Organic Solvent Emission Limitations

Pursuant to 326 IAC 8-6-1(2), the ten (10) offset printers and cleaning solvent are not subject to the requirements of 326 IAC 8-6, because the source is located in Adams County, was constructed prior to October 7, 1974 and modified after January 1, 1980. Therefore, 326 IAC 8-6 does not apply.

326 IAC 8-16 Offset Lithographic Printing and Letterpress Printing

Pursuant to 326 IAC 8-16-1(a), the ten (10) offset printers and cleaning solvent are not subject to the requirements of 326 IAC 8-16, because this rule applies to sources in Lake and Porter County. The source is located in Adams County. Therefore, 326 IAC 8-16 does not apply.

326 IAC 8-17 Industrial Solvent Cleaning Operations

Pursuant to 326 IAC 8-17-1(a)(1), the ten (10) offset printers and cleaning solvent are not subject to the requirements of 326 IAC 8-17, because this rule applies to sources in Lake and Porter County. The source is located in Adams County. Therefore, 326 IAC 8-17 does not apply.

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

Pursuant to 326 IAC 8-1-6(1) the ten (10) offset printers and cleaning solvent are not subject to the requirements of best available control technology (BACT), because the potential emissions of are less than twenty-five (25) tons per year of VOC. Therefore, 326 IAC 8-1-6 does not apply.

Natural gas-fired combustion sources, collectively identified as unit 103

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

The natural gas-fired heaters (heater units 1-10) and roof heaters (roof heater units 1-3)), are exempt from this rule because they are a combustion source for indirect heating (326 IAC 6-3-1(b)(1)). Therefore, the requirements of 326 IAC 6-3-2 do not apply.

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) The testing requirements applicable to this source are as follows:

Testing Requirements					
Emission Unit	Control Device	Pollutant	Capture %	Destruction %	Frequency of Testing
Curing Room	RTO	VOC capture & destruction efficiency	100	98	every five (5) years
Underpress grinders (#1-#11 Trim)			100	97	
Extruder Waste Grinder			100	97	
Silos for regrind flake recycling (#2-#9 Side Grinder and Ext. Grinder)			100	97	

The 326 IAC 8-1-6 BACT review determined that the VOC emissions from the curing room shall be controlled by the RTO which shall have a minimum destruction efficiency of 98%. This is a higher efficiency than the 326 IAC 2-2 PSD requirements for the Curing Room at 97%. The source last performed valid VOC testing on April 30, 2013 with an overall control efficiency of 98.27%. According to Steve Friend with OAQ Compliance, special testing for the curing room is not required since the previous test results demonstrated compliance with the new destruction efficiency. Therefore, the curing room will coincide with the current testing frequency.

These testing requirements are necessary to demonstrate compliance with the 326 IAC 2-2 (PSD) and 326-IAC 8-1-6 (New facilities; general reduction requirements).

There are no testing requirements necessary for the nine (9) silo baghouses that control particulate emissions from extruder waste grinder, eleven (11) underpress grinders, nine (9) silos for regrind flake recycling. These units are able to comply with the 326 IAC 2-2 (PSD) and 326 IAC 6-3-2 (particulate Matter) limits, using a control efficiency of 50%, which falls below the normal efficiency rating for this control device. Therefore, the monitoring requirements should be sufficient to ensure compliance with the particulate matter emission limitations specified in the Permit.

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

Emission Units/Control	Operating Parameters	Range	Frequency
Thermal oxidizer (RTO)	operating temperature	based on most recent valid stack test	Continuous or no less often than once every 15 min, record as hourly block average ⁽¹⁾
Thermal oxidizer (RTO)	RTO fan Hertz	range established by most recent compliant stack test	Record once per day when unit is in operation
Silo Baghouses – exhausting through the Thermal Oxidizer (RTO) stack exhaust ⁽²⁾	Visible Emissions	normal/abnormal emissions by trained employee	Record Daily during daylight operations when exhausting to atmosphere
Pre-filter - exhausting through the Thermal Oxidizer (RTO) stack exhaust ⁽³⁾	Pressure Drop	normal range 1.0 and 3.0 inches of water, or range established from most recent stack test	Record at least three times per day while in operation

(1) Pursuant to FESOP transition to Title V permit T001-30927-00032, issued December 29, 2011, the hourly average temperature for the thermal oxidizer continuous monitoring was clarified as an hourly block average temperature. This renewal permit has been updated to include this language.

(2) With this renewal permit, it is clarified that the visible emissions notation compliance monitoring will record visible emissions necessary for compliance for particulate limits from the regenerative thermal oxidizer (RTO) stack exhaust because the silo baghouses

and pre-filter also exhaust through the same stack as the RTO. This requirement has been changed because the silo baghouses do not have a separate stack and share a stack with the RTO. Therefore, there are no visible emissions to record from the baghouses directly. The IDEM OAQ inspector has confirmed that the source has not recorded visible emissions because the baghouses do not exhaust to the atmosphere. This is a Title 1 change.

- (3) With this renewal permit, it is clarified that the Permittee will record the pressure drop from the across the pre-filter as currently indicated in the permit. OAQ Compliance Inspector David Zier has verified that the pre-filter is in fact a separate control device that filters the entire building (like a building air cleaner) so it would be proper to have some type of monitoring on this device. Pursuant to permit T001-30927-00032, issued December 29, 2011, the pressure drop monitoring frequency was increased to three times a day and deviates from the standard monitoring frequency. This frequency shall continue to be used with the pre-filter pressure drop monitoring.

These monitoring conditions are necessary because the regenerative thermal oxidizer (RTO), and silo baghouses for the polystyrene food packaging production line must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations), 326 IAC 2-2 (PSD), and 40 CFR 64 (CAM).

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on March 17, 2016.

Conclusion

The operation of this stationary polystyrene extrusion plant shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T001-36966-00032.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jean Fix 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) 234-8531 or toll free at 1-800-451-6027 extension 4-8531.
- (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 Unlimited and Limited Emissions**

**Company Name: Dolco Packaging
Address City IN Zip: 2110 Patterson Street, Decatur, IN 46733
Part 70 Permit Renewal No.: 001-36966-00032
Reviewer: Jean Fix
Received Date: March 17, 2016**

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	
Polystyrene 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
Polystyrene Food Packaging Production Line**

**Company Name: Dolco Packaging
Address City IN Zip: 2110 Patterson Street, Decatur, IN 46733
Part 70 Permit Renewal No.: 001-36966-00032
Reviewer: Jean Fix
Received Date: March 17, 2016**

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 - 9 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 - 11	1.53%	13.85	0.0%	0.0%	0.00	13.85
Thermoforming Waste Grinders - 11	15.63%	141.46	100.0%	97.0%	137.22	4.24
Extruder Waste Grinder	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:	100.00%	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
*Maximum Resin Usage (virgin polystyrene) furnished by source from application for SSM 001-36607-00032, issued March 18, 2016
**Polystyrene (virgin + recycled) Maximum = Max resin usage (virgin) * (Max throughput of recycled*8760/2000)
Max throughput of recycled polystyrene furnished by source from application for SSM 001-36607-00032, issued March 18, 2016

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 the polystyrene food packaging production line:

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) =

Total Controlled Emissions from Nine (9) baghouses = (2.34 tons/yr) * (9 baghouses) =

Uncontrolled Emissions = (Controlled Emissions) / (1-0.99) =

Total Uncontrolled Emissions = Uncontrolled Emissions from one (1) baghouse * 9 baghouses

Limited PM Emissions = 4.1 * 3.6 (tons/hr)^0.67 =

Limited PM Emissions =

Assume PM10 and PM2.5 = PM

2.34 tons/yr (per baghouse)
21.08 tons/yr (nine (9) baghouses)
234.3 tons/yr (per baghouse)
2,108.4 tons/yr (nine (9) baghouses)
9.67 pounds per hour
42.36 tons/yr

**Appendix A: Emission Calculations
Talc and Colorator Handling**

Company Name: Dolco Packaging
Address City IN Zip: 2110 Patterson Street, Decatur, IN 46733
Part 70 Permit Renewal No.: 001-36966-00032
Reviewer: Jean Fix
Received Date: March 17, 2016

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
Part 70 Permit Renewal No.: 001-36966-00032
Reviewer: Jean Fix
Received Date: March 17, 2016

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 uncontrolled.
 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
Part 70 Permit Renewal No.: 001-36966-00032
Reviewer: Jean Fix
Received Date: March 17, 2016**

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

Unit list (MMBtu)	
RTO	2.00
Heaters 1-9	2.52
Heater 10	0.15
Roof heaters 1-2	2.10
Roof heaters 3-5	1.50

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.07	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					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	7.458E-05	4.261E-05	2.663E-03	6.392E-02	1.207E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 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
Single HAP	6.392E-02

**Appendix A: Emission Calculations
Printing Operations**

**Company Name: Dolco Packaging
Address City IN Zip: 2110 Patterson Street, Decatur, IN 46733
Part 70 Permit Renewal No.: 001-36966-00032
Reviewer: Jean Fix
Received Date: March 17, 2016**

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.

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

**Appendix B
Best Available Control Technology (BACT) Determination**

Source Description and Location
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Source Name:	Dolco Packaging
Source Location:	2110 Patterson Street, Decatur, Indiana 46733
County:	Adams
SIC Code:	3086 (Plastics Foam Products)
Permit Renewal No.:	T 001-36966-00032
Permit Reviewer:	Brian Williams

Introduction

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) has performed the following Best Available Control Technology (BACT) review for the existing curing room, which is part of the existing polystyrene food packaging production line.

1997:

In 1972, Dolco Packaging constructed a polystyrene food packaging production line, which had an uncontrolled potential to emit greater than twenty-five (25) tons of VOC per year. This source received FESOP No. 001-7300-00032 on April 14, 1997. As explained in the technical support document, IDEM determined then that the polystyrene food packaging production line was not subject to the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) because this line was considered a facility and was constructed prior to the applicability date of January 1, 1980, even though there are operations within the line that were constructed after 1980. The polystyrene food packaging production line consisted of foam extruders, curing operations, thermoformers, grinders, and silos.

Pursuant to 326 IAC 1-2-27, facility is defined as any one (1) structure, piece of equipment, installation or operation which emits or has the potential to emit any air contaminant. Single pieces of equipment or installations with multiple emission points shall be considered a facility for the purpose of this rule.

2002:

Dolco Packaging was issued its first FESOP Renewal (001-14652-00032) on September 11, 2002. As explained again in the supporting document, the same determination was carried over in this renewal that the polystyrene food packaging production line was not subject to the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) because this facility was constructed prior to the applicability date of January 1, 1980.

2011:

The source subsequently transitioned from FESOP to a Part 70 Operating Permit No. 001-30927-00032 on December 29, 2011 due to an addition of a new polystyrene foam extruder to the polystyrene food packaging production line. This new extruder was evaluated as a facility by itself under 326 IAC 8-1-6, and eventually the source took a VOC limit of less than twenty-five (25) tons per year to render 326 IAC 8-1-6 not applicable. This determination is different from the determination made in 1997.

After further review in this pending Part 70 permit renewal, IDEM has determined that the extruder never had a potential to emit greater than twenty-five (25) tons of VOC per year. Therefore, the

extruder is not subject to the requirements of 326 IAC 8-1-6 and an avoidance limit was never necessary. This limit will be removed in this Part 70 permit renewal.

Even though it is not documented, it is assumed that same determination for the existing polystyrene food packaging production line was carried over in this Part 70 permit since no changes were made to the permit for the existing foam extruders.

2016:

On March 18, 2016, the existing polystyrene food packaging production line was again approved for modification to add a new polystyrene foam extruder. Based on the review, the foam extruder, identified as E-6, is considered a facility by itself under 326 IAC 8-1-6 and not subject to this rule because the VOC potential emissions are less than twenty-five (25) tons per year. This determination is different from the determination made in 1997, but consistent with the evaluation made in 2011.

2016:

Dolco Packaging currently has a pending Part 70 permit renewal application. After further review of the process and with the concurrence of Dolco Packaging, IDEM determined that the extruders, curing operations, thermoformers, grinders, and silos operate independently of each other. Therefore, IDEM has performed the following reevaluation of the applicability of 326 IAC 8-1-6 for the emission units that make up the polystyrene food packaging production line.

Emission Unit	Construction Date	Unlimited VOC PTE (tons/year)	326 IAC 8-1-6 Applicable (Y/N)
Two (2) Virgin Pellet Silos	1972	0	N
Extruder (E-1 through E6)	1971 - 2016	<25, each	N
Extruder Waste Grinder	1972	<25	N
Curing Operation - Curing Room	1997	>25	Y
Curing Operation - Outside Storage	1972	>25	N
Thermoformers (#1 - #11 Irwin)	1974 - 2016	<25, each	N
Underpress Grinders (#1 - #11 Trim)	1977 - 2016	<25, each	N
Nine (9) Regrind Silos	1972	<25, each	N

Based on the table above, the curing room, constructed in 1997, is subject to the requirements of 326 IAC 8-1-6, because it was constructed after January 1, 1980 and has an unlimited potential to emit greater than twenty-five (25) tons of VOC per year. The VOC emissions from the curing room are currently controlled by a regenerative thermal oxidizer (RTO) that was constructed in 1998.

The requirements of 326 IAC 8-1-6 are not applicable to any of the other emission units because they were either constructed before January 1, 1980, which is the applicability date for 326 IAC 8-1-6 or they were constructed after January 1, 1980 and have an unlimited potential to emit less than twenty-five (25) tons of VOC per year.

The following BACT analysis for the curing room uses the "Top Down BACT Guidance" published by the U.S. EPA, Office of Air Quality Planning and Standards, March 15, 1990.

Description of Process

- (a) One (1) polystyrene food packaging production line, collectively identified as unit 101, with a maximum throughput of 5,754.51 pounds of virgin and recycled polystyrene per hour and a maximum capacity of 206.64 pounds of butane blowing agent per hour, and consisting of the following:
- (1) One (1) curing room, constructed in 1997, equipped with one (1) natural gas fired regenerative thermal oxidizer (RTO), constructed in 1998, with a maximum capacity of two (2) million British thermal units per hour, exhausting through a stack to the atmosphere.

Summary of the Best Available Control Technology (BACT) Process

BACT is a mass emission limitation based on the maximum degree of pollution reduction of emissions, which is achievable on a case-by-case basis. BACT analysis takes into account the energy, environmental, and economic impacts on the source. These reductions may be determined through the application of available control techniques, process design, work practices, and operational limitations.

Federal guidance on BACT requires an evaluation that follows a “top down” process. In this approach, the applicant identifies the best-controlled similar source on the basis of controls required by regulation or controls achieved in practice. The highest level of control is then evaluated for technical and economic feasibility.

The five (5) basic steps of a top-down BACT analysis are listed below:

Step 1: Identify Potential Control Technologies

The first step is to identify potentially “available” control options for each emission unit and for each pollutant under review. Available options should consist of a list of those technologies with a potentially practical application to the emissions unit in question. The list should include lowest achievable emission rate (LAER) technologies and controls applied to similar source categories.

Step 2: Eliminate Technically Infeasible Options

The second step is to eliminate technically infeasible options from further consideration. To be considered feasible, a technology must be both available and applicable. It is important in this step that any presentation of a technical argument for eliminating a technology from further consideration be documented based on physical, chemical, engineering, and source-specific factors related to safe and successful use of the controls. Innovative control means a control that has not been demonstrated in a commercial application on similar units. Only available and proven control technologies are evaluated. A control technology is considered available when there are sufficient data indicating that the technology results in confirmed reductions in emissions of regulated pollutants.

Step 3: Rank the Remaining Control Technologies by Control Effectiveness

The third step is to rank the technologies not eliminated in Step 2 in order of descending control effectiveness for each pollutant of concern. The ranked alternatives are reviewed in terms of environmental, energy, and economic impacts specific to the proposed modification. If the analysis determines that the evaluated alternative is not appropriate as BACT due to any of the impacts, then the next most effective is evaluated. This process is repeated until a control alternative is chosen as BACT. If the highest ranked technology is proposed as BACT, it is not necessary to perform any further technical or economic evaluation.

Step 4: Evaluate the Most Effective Controls and Document the Results

The fourth step entails an evaluation of energy, environmental, and economic impacts for determining a final level of control. The evaluation begins with the most stringent control option and continues until a technology under consideration cannot be eliminated based on adverse energy, environmental, or economic impacts.

Step 5: Select BACT

The fifth and final step is to select as BACT the most effective of the remaining technologies under consideration for each pollutant of concern. For the technologies determined to be feasible, there may be several different limits that have been set as BACT for the same control technology. The final BACT determination would be the technology with the most stringent corresponding limit that is economically feasible. BACT must be no less stringent than the level of control required by any applicable New Source Performance Standard (NSPS) and National Emissions Standard for Hazardous Air Pollutants (NESHAP) or state regulatory standards applicable to the emission units included in the permits.

The Office of Air Quality (OAQ) makes BACT determinations by following the five steps identified above.

A summary of the BACT review for the surface coating line is provided below. This BACT determination is based on the following information:

- (1) The EPA RACT/BACT/LAER (RBL) Clearinghouse; and
- (2) State and local air quality permits.

VOC BACT Analysis

Step 1 – Identify All Potentially Available Control Options

Based on the information reviewed for this BACT determination, the following potentially available control technologies were identified for controlling VOC emissions from the food trays production line:

- (1) Boiler:

Boilers are used as afterburners to incinerate air contaminants. The primary function of a boiler is to supply steam or hot water and whenever it is used as a control device it conflicts with this function, one or both of its purposes will suffer. Like any other types of controls, boilers require a properly design exhaust system to convey air pollutants effectively from the point of origin to the boiler firebox. Contaminated gases may be introduced into the boiler firebox in two ways:

- (1) Through the burner, serving as combustion air, or
- (2) Downstream of the burner, serving as secondary air.

- (2) Catalytic Oxidation:

In a catalytic oxidizer, a catalyst is used to lower the activation energy for oxidation. When a preheated gas stream is passed through a catalytic oxidizer, the catalyst bed initiates and promotes the oxidation of VOCs without being permanently altered itself. In catalytic oxidation, combustion occurs at significantly lower temperatures than that of direct flame units and can also achieve a destruction efficiency of 95%. However, steps must be taken to ensure complete combustion. The types of catalysts used include platinum, platinum alloys, copper chromate, copper oxide, chromium, manganese and nickel. These catalysts are deposited in thin layers on an inert substrate, usually a honeycomb shaped ceramic.

(3) Regenerative Thermal Oxidizer:

Thermal oxidation is the process of oxidizing organic contaminants in a waste gas stream by raising the temperature above the auto ignition point in the presence of oxygen for sufficient time to completely oxidize the organic contaminants to carbon dioxide and water. The residence time, temperature, flow velocity and mixing, and the oxygen concentration in the combustion chamber affect the oxidation rate and destruction efficiency. Thermal oxidizers typically require combustion of an auxiliary fuel (e.g., natural gas) to maintain combustion chamber temperature high enough to completely oxidize the contaminant gases. Thermal oxidizers are typically designed to have a residence time of one second or less and combustion chamber temperatures between 1,200 and 2,000°F.

A regenerative thermal oxidizer uses a high-density media such as a packed ceramic bed, which was heated in a previous cycle, to preheat the incoming waste gas stream, resulting in improved oxidizer efficiency and significant fuel cost savings. Process gases pass through the RTO inlet isolation damper before entering the inlet of the RTO. Upon entering the RTO, the gases pass up through a heat recovery section (pre-heating mode), enter the combustion chamber where the VOCs are destroyed and then pass through another heat recovery section (heat recovery mode), and exit the system via the exhaust duct. A regenerative thermal oxidizer can be configured to have a two pass or three pass system, where the heat regeneration beds are passed by the gases either 2 or 3 times. For this application the theoretical thermal efficiency is increased from 90% for a two-pass system to 95% for a three pass system. However, the three pass system initial cost is higher and the required fan energy is also higher.

(4) Recuperative Thermal Oxidizer:

Thermal recuperative oxidizers have a primary and/or secondary heat exchanger within the system. The difference between a recuperative oxidizer and a regenerative oxidizer is simply where the reclaimed heat is used. Essentially, the regenerative oxidizer puts the heat back into the process of destroying the VOCs, whereas a recuperative oxidizer routes the heat to another process instead (like cogeneration).

(5) Catalytic Incinerator:

In a catalytic incinerator, a catalyst is used to lower the activation energy for oxidation. When a preheated gas stream is passed through a catalytic oxidizer, the catalyst bed initiates and promotes the oxidation of VOCs without being permanently altered itself. In catalytic incineration, combustion occurs at significantly lower temperatures than that of direct flame units and can achieve a destruction efficiency of 95%. However, steps must be taken to ensure complete combustion. Common types of catalysts used include platinum, platinum alloys, copper chromate, copper oxide, chromium, manganese, and nickel. These catalysts are typically deposited in thin layers on an inert substrate, usually a honeycomb shaped ceramic. Catalytic incineration are not suited to systems with high exhaust volumes, variable types and concentrations of VOC, and where catalyst poisons or fouling contaminants are present.

(6) Absorption systems:

Absorption is a basic chemical engineering unit operation, which is frequently referred to in the air pollution control field as "Scrubbing." It is a diffusional process involving the transfer of gas molecules to a liquid phase. Equipment used for the absorption of gases can be placed in five categories; packed tower, plate tower, spray chamber, venturi scrubber, and jet scrubber. There is no known application of this control technology in polystyrene foam production industry. Therefore this control option is considered technically infeasible for this application and will not be considered any further in this BACT analysis.

(7) Carbon Adsorption:

Carbon adsorption is a process, by which VOC is retained on a granular carbon surface, which is highly porous and has a very large surface-to-volume ratio. Adsorption is rapid and removes most of the VOC in the stream. Eventually, the adsorbent becomes saturated with the vapors and the system's efficiency drops. The adsorbent must be regenerated or replaced soon after efficiency begins to decline. In regenerative systems, the adsorbent is reactivated with steam or hot air and the absorbate (solvent) is recovered for reuse or disposal. Non-regenerative systems require the removal of the adsorbent and replacement with fresh or previously regenerated carbon.

Step 2 – Eliminate Technically Infeasible Control Options

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined the following control options are technically infeasible:

(1) Catalytic Oxidation:

Based upon a review of the previously listed information resources, there is no known application to control VOC emissions from a polystyrene curing room. The optimal working temperature range for VOC oxidation catalysts is approximately 850°F - 1,100°F with a minimum exhaust gas stream temperature of 500°F for minimally acceptable VOC control. Exhaust gases from the polystyrene cure room are far below the minimum 500°F threshold for effective operation of the oxidation catalyst system. In addition, there is a concern of particulate polystyrene settling on the bed, which would lower the overall control efficiency, as well as cause the risk of a fire if the butane were to collect. Consequently, this control option is considered technically infeasible for this application and will not be considered any further in this BACT analysis.

(2) Catalytic Incinerator:

This system was deemed infeasible due to the fouling of catalyst from the possible collection of polystyrene on the catalyst, which would lead to a reduced life span of the catalyst. In addition, buildup of polystyrene on the catalyst would potentially cause fires or explosions due to a build up of VOC's and natural gas in the Oxidizer, due to retention in the oxidizer. This control option is not technically feasible and has been eliminated from further consideration in this BACT analysis.

(3) Absorption systems:

There is no known application of this control technology in polystyrene foam production industry. Therefore this control option is considered technically infeasible for this application and will not be considered any further in this BACT analysis.

(4) Carbon Adsorption:

There is no known application of this control technology in polystyrene foam production industry. Therefore this control option is considered technically infeasible for this application and will not be considered any further in this BACT analysis.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

IDEM, OAQ has ranked the technically feasible control technologies and combinations of control technologies as follows:

Control Technology	Overall Control Efficiency (%)
Regenerative Thermal Oxidizer	98%
Boiler	98%
Recuperative Thermal Oxidizer	98%

Step 4 – Evaluate the Most Effective Controls and Document Results

A review of EPA's RACT/BACT/LAER Clearinghouse (RBLC) and Indiana Air Permits identified the following previous BACT determinations for sources that operate under the SIC Codes 3086 (Plastics Foam Products) or for process type codes 99.014 (Polystyrene Foam Products Manufacturing) or 99.999 (Other Miscellaneous Sources):

Plant/ Facility Description	RBLC ID or Permit #	Date Issued and State	Emission Unit	VOC Control Technology/VOC Emissions Limit	Basis of Limit or Control
<i>Proposed</i> Dolco Packaging Expandable Polystyrene (EPS) manufacturing (butane as blowing agent)	001-36966-00023	Pending IN	Curing Room	VOC emissions after control from curing room shall not exceed 2.38 tons per twelve (12) month consecutive month period RTO with 100% capture efficiency and minimum destruction efficiency of 98%	State BACT
Carpenter Co. Expandable Polystyrene (EPS) manufacturing (pentane as blowing agent)	SSM No. 039-35547-00086	12/28/2015 IN	polystyrene foam manufacturing line	The pentane content in the polystyrene beads used in the expanded polystyrene foam manufacturing line shall not exceed 6.5%. The input of polystyrene beads to the expanded polystyrene foam manufacturing line shall not exceed 9,500,000 pounds per twelve (12) consecutive month period with compliance determined at the end of each month. The VOC capture system for the following emissions units shall be in a permanent total enclosure to ensure nominal 100% capture of VOC emissions: (1) One (1) hermetically sealed pre-expander, identified as EU-7.1;	State BACT

Plant/ Facility Description	RBLC ID or Permit #	Date Issued and State	Emission Unit	VOC Control Technology/VOC Emissions Limit	Basis of Limit or Control
<p>Carpenter</p> <p>Expandable Polystyrene (EPS) manufacturing (pentane as blowing agent)</p>	<p>SSM No. 039-35547-00086</p>	<p>12/28/2015 IN</p>	<p>polystyrene foam manufacturing line</p>	<p>(2) One (1) drying bed, identified as EU-7.2;</p> <p>(3) One (1) pre-puff aging silos, identified as EU-7.3; and</p> <p>(4) One (1) block molding machine, identified as EU-7.4. These emissions are from the steam when the pressure is released from the mold.</p> <p>The VOC emissions from the pre-expander, drying bed, pre-puff aging silos, block molding machine (only the steam when pressure is released from the mold) shall be controlled by a natural gas-fired regenerative thermal oxidizer (RTO) (EU-9) and this RTO shall have a minimum VOC destruction efficiency of 98% and VOC emissions after control shall not exceed 0.002 pounds per ton of polystyrene beads.</p> <p>The uncaptured VOC emissions from the block molding machine identified as EU-7.4, shall not exceed 0.003 pounds per ton of polystyrene beads. These emissions occur during mold filling or the steaming operation.</p> <p>The uncontrolled VOC emissions from the storage and fabrication area, identified as EU-7.5, shall not exceed 0.016 pounds per ton of polystyrene beads.</p>	
<p>Genpak, LLC</p> <p>Expandable Polystyrene (EPS) manufacturing (butane as blowing agent)</p>	<p>SSM No. 143-35401-00016</p>	<p>07/06/2015 Indiana</p>	<p>Food trays production line</p>	<p>Blowing agent (butane) usage shall be limited to 677.44 tons per twelve (12) month consecutive period.</p> <p>Butane release rate for each processing line (extrusion, roll storage, and thermoform) shall exceed 5.10 pounds of uncontrolled VOC emitted per hour, combined.</p> <p>Butane release rate for each fluff silo shall not exceed 25.62 pounds of uncontrolled VOC emitted per hour, combined.</p> <p>Butane release rate for the repelletizer shall not exceed 0.64 pounds of VOC emitted per hour after controls.</p> <p>Permanent total enclosure and RTO for repelletizer.</p> <p>Capture System Efficiency - 100%</p> <p>Destruction Efficiency - 98%</p>	<p>State BACT</p>

Plant/ Facility Description	RBLC ID or Permit #	Date Issued and State	Emission Unit	VOC Control Technology/VOC Emissions Limit	Basis of Limit or Control
Fagerdala Packaging Inc. (Indiana) Polyethylene extruded foam manufacturing plant	063-34203-00071	06/12/2014 Indiana	Polyethylene sheet foam extruder and temporary storage area (SFE-01)	Permanent total enclosure and RTO Overall Control Efficiency - 98% Input of blowing agent (isobutane) shall not exceed 241.4 tons per year. 4.83 tons of VOC per year after control	State BACT
EFP, LLC Polystyrene foam products manufacturing source	039-29482-00099	12/17/2010 Indiana	EPS Pre-Expander	Add on controls not economically feasible - \$5,975 per ton of VOC removed Average VOC content of EPS beads shall not exceed 6.0% VOC content of EPE beads shall not exceed 12% Source shall continue to search for material with lower VOC content	State BACT
JELD-WEN Insulated fiberglass and steel door manufacturing facility.	113-22426-00047	04/21/2006 Indiana	Expandable polystyrene block molding operation	VOC capture by two (2) permanent total enclosures; VOC destruction by one (1) RTO, except in the months of November, December, January, February, and March when not actively molding polystyrene bead. Overall control efficiency of 78% is required	State BACT
Tenneco Packaging AVI Packaging sheets and plank foam	CP 099-9807-00028	10/29/1998 Indiana	Foam scrap lines	RTO Capture system - 98% Destruction Efficiency - 95%	State BACT
Cryovac Rigid Packaging, Sealed Air Corporation Plastic extrusion and thermoforming facility producing polystyrene extruded foam products	CP 097-5348-00093	11/4/1997 Indiana	Reclaim Extruders	Flash Incinerator Destruction Efficiency - 90% Resin usage shall be limited to 28,546 tons of resin per year. Blowing agent limited to 1,316 tons per year. Equivalent to 805.3 tons of VOC per year after control.	PSD and State BACT
Tegant Diversified Brands, Inc.	CP 091-4823-00079	03/29/1996 Indiana	Expandable polystyrene molding process	No controls required; Use of material with lowest-available pentane content required plus ongoing research and movement to materials with lower pentane/VOC content	State BACT
	091-7666-00079	10/14/1999 Indiana	Pre-expanders	No controls required; Maximum average VOC (pentane) content of materials is 5.5%; Ongoing research for lowest VOC-containing materials and alternates required	
	091-14438-00079	11/02/2001 Indiana	Four (4) molding presses	No controls required; VOC usage limited to 155.22 tpy; Molding compound shall not exceed 5.5% VOC	

Plant/ Facility Description	RBLC ID or Permit #	Date Issued and State	Emission Unit	VOC Control Technology/VOC Emissions Limit	Basis of Limit or Control
				(pentane) content; Ongoing research for lowest VOC-containing materials and alternates required	
Dart Container Corporation Foam (expandable polystyrene) container manufacturing	MI-0384	03/08/2007 Michigan	EUCUP: Production of Foam Containers	Three (3) Steam Boilers for control of pentane from pre-expansion system Capture Efficiency - 30% Destruction Efficiency - 95% 75.33 pounds of VOC per hour 219.95 tons of VOC per year	LAER, State BACT
Dart Container Corporation EPS container manufacturing using steam pre-expander and steam chest molding processes	MS-0085	01/31/2007 Mississippi	Cup Manufacturing Process	Boiler for control of pentane emissions Destruction Efficiency - 95% 495 tons of VOC per year	PSD BACT
Dart Container Corporation Expandable Polystyrene (EPS) cups and containers molding	KY-0080	04/26/2001 Kentucky	Foam Extrusion Lines	RTO Capture Efficiency - 100% Destruction Efficiency - 95% 1.45 tons of VOC per day 523.60 tons of VOC per year	State BACT
			Polystyrene Container Manufacturing	Capture Hood and Boiler 203 tons of VOC per year	State BACT
Dart Container Corporation Expandable Polystyrene (EPS) cups	PA-0210	12/14/2001 Pennsylvania	EPS Container Manufacturer	Boiler Destruction Efficiency - 95% 313.97 tons of VOC per year for total facility	State BACT
Dart Container Corporation Expandable Polystyrene (EPS) cups and containers molding	PA-0210	12/14/2001 Pennsylvania	Polystyrene Extrusion	Boiler for pentane emissions Destruction Efficiency - 95% 3.67 lbs of pentane per 100 lbs of EPS 314 tons of VOC per year	LAER

Plant/ Facility Description	RBLC ID or Permit #	Date Issued and State	Emission Unit	VOC Control Technology/VOC Emissions Limit	Basis of Limit or Control
Dartco of Texas	TX-0394	05/21/2001 Texas	ESP Mfg. Building	No add on controls 115 lbs of pentane per hour 436 tons of pentane per year 0.22 lbs of VOC per hour 0.50 tons of VOC per year	PSD BACT
Dart Container Corporation Expandable Polystyrene (EPS) cups	Mi-0273	10/13/2000 Michigan	Expandable Polystyrene Molding (Pre-Expansion, Storage, And Molding)	No Controls Required; Pentane Limit Of 5.75 Lb/ 100 Lb Of Beads 37.0 Lb/Hr Amount Of Blowing Agent Is Limited To 7% Weight Of Bead. Approximately 15% Retained In Shipped Product. Additional Limit: 82 T/Yr	State BACT

The most stringent BACT identified in the table above require the use of an RTO with 100% capture efficiency and 98% destruction efficiency, controlling for VOCs generated from the use of butane as the blowing agent in the expandable polystyrene manufacturing process. The proposed BACT for the curing room will be equal to the most stringent BACT. In addition, the VOC emissions after control will be limited to 2.38 tons of VOC per twelve (12) consecutive month period.

The VOC emissions after control were determined as follows:

$$\text{VOC Emissions (tons/year)} = 905.08 \text{ tons butane/year} \times 13.15 \text{ lbs of VOC emitted/100 lbs of butane used} \times (1 - 98\% \text{ overall control efficiency}/100)$$

Dolco Packaging is currently required to achieve a minimum capture efficiency of 100% and a minimum destruction efficiency of 97% in order to render the requirements of 326 IAC 2-2 (PSD) not applicable. Dolco Packaging last performed stack testing on April 30, 2013 and was able to achieve a destruction efficiency of 98.27% and a capture efficiency of 100%. Therefore, Dolco Packaging has demonstrated that compliance with the higher destruction efficiency is achievable.

BACT Conclusion

The following are the detailed BACT requirements:

Pursuant to 326 IAC 8-1-6 and Part 70 Operating Permit Renewal No. 001-36966-00032, the Best Available Control Technology (BACT) for the curing room shall be the following:

- (a) The VOC emissions from the curing room shall not exceed 2.38 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.
- (b) The VOC emissions from the curing room shall be controlled by the regenerative thermal oxidizer (RTO). The RTO shall have a minimum destruction efficiency of 98%.
- (c) The capture systems for the curing room shall have a minimum capture efficiency of 100%.



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 Public Comment

July 29, 2016
Dolco Packaging
001-36966-00032

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 2/17/2016



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Carol S. Comer
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

July 29, 2016

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

Permit Number: 001-36966-00032
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 2/17/2016



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Michael R. Pence
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Carol S. Comer
Commissioner

July 29, 2016

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

Re: Public Notice
Dolco Packaging
Permit Level: Part 70 Operating Permit Renewal
Permit Number: 001-36966-00032

Dear Mr. Schroeder:

Enclosed is a copy of your draft Part 70 Operating Permit Renewal, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Decatur Daily Democrat in Decatur, Indiana publish the abbreviated version of the public notice no later than August 2, 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 Jean Fix, 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 4-8531 or dial (317) 234-8531.

Sincerely,

Greg Hotopp

Greg Hotopp
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

July 29, 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: 001-36966-00032

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 2/16/2016



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

July 29, 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 August 2, 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: Part 70 Operating Permit Renewal
Permit Number: 001-36966-00032

Enclosure

PN Newspaper.dot 2/17/2016

Mail Code 61-53

IDEM Staff	GHOTOPP 7/29/2016 Dolco Packaging 001-36966-00032 Draft		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Richard Schroeder Dolco Packaging 2110 Patterson Street Decatur IN 46733 (Source CAATS)										
2		Jim Baumgartner Decatur 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 172 N. 2nd Street Decatur IN 46733-1609 (Local Official)										
8		Larry Bernson Environmental Consulting, Inc. 17 Glen Hook Road Hillsdale NJ 07642 (Consultant)										
9		Terry Smith Adams County Health Dept. 313 W. Jefferson Decatur IN 46733 (Local Official)										
10		John August Adams County EMA & LEPC Director 313 S. 1st St. Decatur IN 46733 (Local Official)										
11		Mayor 172 N. 2nd St. Decatur IN 46733 (Local Official)										
12		Neil Ogg Plan Director 313 W. Jefferson Decatur IN 46733 (Local Official)										
13												
14												
15												

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