



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

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

Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a  
Significant Revision to a  
Federally Enforceable State Operating Permit (FESOP)

for Poly-Wood, LLC in Kosciusko County

Significant Permit Revision No.: 085-37003-00132

The Indiana Department of Environmental Management (IDEM) has received an application from Poly-Wood, LLC, located at 1001 W. Brooklyn Street, Syracuse, IN 46567, for a significant revision of its FESOP issued on May 19, 2015. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow Poly-Wood, LLC to make certain changes at its existing source. Poly-Wood, LLC has applied to increase the throughput of for plastics parts, fanning, powder coating, and painting operations and add heating units.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). The potential to emit of any regulated air pollutants will continue to be limited to less than the Title V and PSD major threshold levels. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

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

Syracuse Public Library  
115 East Main Street  
Syracuse, IN 46567

and

IDEM Northern Regional Office  
300 N. Michigan Street, Suite 450  
South Bend, IN 46601-1295

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

### How can you participate in this process?

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

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public

meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR 085-37003-00132 in all correspondence.

**Comments should be sent to:**

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

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

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

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

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

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



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



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Governor

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Commissioner

## DRAFT

Doug Rassi  
Poly-Wood, LLC  
1001 West Brooklyn Street  
Syracuse, IN, 46567

Re: 085-37003-00132  
Significant Revision to  
F085-35324-00132

Dear Mr. Rassi:

Poly-Wood, LLC was issued a Federally Enforceable State Operating Permit (FESOP) No. F085-35324-00132 on May 19, 2015 for a stationary household furniture manufacturing source located at 1001 W. Brooklyn Street, Syracuse, Indiana 46567. On March 28, 2016, the Office of Air Quality (OAQ) received an application from the source requesting increase the throughput of for plastics parts, faming, posdercoating, and painting operations and add heating units to the permit. The attached Technical Support Document (TSD) provides additional explanation of the changes to the permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions  
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Monica Dick of my staff at 317-234-1243 or 1-800-451-6027, and ask for extension 4-1243.

Sincerely,

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

Attachments: Technical Support Document and revised permit

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



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Governor

Carol S. Comer  
Commissioner

# DRAFT New Source Construction and Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**Poly-Wood LLC  
1001 W. Brooklyn Street  
Syracuse, Indiana 46567**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions

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

Operation Permit No.: F085-35324-00132	
<i>Original Issued by:</i> Chrystal A. Wagner, Section Chief Permits Branch, Office of Air Quality	Issuance Date: May 19, 2015  Expiration Date: May 19, 2020

Administrative Amendment No.: 085-36303-00132, issued on October 6, 2015

First Significant Permit Revision No.: 085-37003-00132	
Issued by:  Josiah K. Balogun, Section Chief Permits Branch Office of Air Quality	Issuance Date:  Expiration Date: May 19, 2020

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## SECTION A

## SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary household furniture manufacturing source.

Source Address:	1001 W. Brooklyn Street, Syracuse, Indiana 46567
General Source Phone Number:	(574) 457-3284
SIC Code:	2519 (Household Furniture, NEC)
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) plastic product manufacturing line EU001, constructed in 2001 and modified in 2016, consisting of the following:
  - (1) Twelve (12) plastic extruders, identified as Extruders 1 through 12, with a maximum capacity of extruding 2346 pounds per hour, equipped with a dust collector for control, identified as control equipment ID 001-1 and exhausting indoors;
  - (2) Sawing operations following extrusion to size timber, with a maximum capacity of processing 2346 pounds per hour, uncontrolled and exhausting indoors;
  - (3) Plastic machining operations, including sawing, board cutting, and CNC, with a maximum capacity of processing 2250 pounds per hour of raw plastic, using a dust collector as PM control, identified as control equipment ID 001-6 and exhausting through stack 104; and
  - (4) One (1) moulder, with a maximum capacity of processing 300 pounds per hour of plastic boards, controlled by a dust collector, identified as control equipment ID 001-5, and exhausting through stack 96.
- (b) One (1) aluminum frame construction operations, identified as EU002, constructed in 2011 and modified in 2016, with a maximum capacity of 607 pounds per hour, including sawing, CNC, brake press, sanding/grinding units, using a dust collector and filter as PM control, identified as control equipment ID 002-1, and exhausting indoors.
- (c) One (1) powder coating operation, identified as EU003, constructed in 2011 and modified in 2016, with a maximum capacity of 36 pounds per hour, using a dust collector and filter as PM control, identified as control equipment ID 003-1, and exhausting indoors.

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- (d) One (1) plastic painting operation, identified as EU004, approved in 2015 for construction, with a maximum capacity of 37.8 pounds of products painted per hour, using a filter as PM control, identified as control equipment ID 004-2, and exhausting to Stack 76.

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

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This stationary source also includes the following insignificant activities:

- (a) Eight one (81) natural gas combustion units, constructed in 2011 and modified in 2016, consisting of a total heat input capacity of 6.02 MMBTU per hour for comfort heating, 1.5 MMBTU per hour for heating the powder coating washers, and process ovens totaling 4.54 MMBtu per hour.
- (b) Two (2) portable diesel-fired emergency generators, constructed in 2001, rated at 10 hp each.  
  
Under 40 CFR 63, Subpart ZZZZ, these non-stationary generators are exempt  
Under 40 CFR 60, Subpart IIII, these non-stationary generators are exempt
- (c) Plastics products design center, processing a maximum of 333.9 pounds per hour, constructed in 2001 and modified in 2016, not associated with the process line or manufacturing, controlled by a voluntary dust collector, identified as control equipment ID 001-2, exhausting out stack #23.
- (d) Plastics products hand held tools including routers for plastics machining processing a maximum of 1,499 pounds per hour, constructed in 2001 and modified in 2016.
- (e) Plastics products mixer, processing 2,346 pounds per hour, enclosed process with pneumatic conveyance to extruder, constructed in 2001 and modified in 2016.
- (f) Plastics products raw plastics storage, pneumatic conveying a maximum of 2,250 pounds per hour to the mixer, constructed in 2001 and modified in 2016, voluntary dust collector for recycle fine collection, identified as control equipment ID 001-1, exhausting indoors.
- (g) Process washers for powder coating using non-VOC and Non-HAP liquids, constructed in 2011 and modified in 2016.
- (h) Welding operations, constructed in 2011 and modified in 2016, exhausting indoors, consisting of the following:
  - (1) Seven (7) MIG welding cells with a maximum capacity of using 0.25 pounds per hour of wire; and
  - (2) Five (5) TIG welding cells with a maximum capacity of using 0.41 pounds per hour of wire.

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

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

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## SECTION B GENERAL CONDITIONS

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

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

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

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

### B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

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This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as described in the application or the permit. The emission units covered in this permit may continue operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as described.
- (b) If actual construction of the emission units differs from the construction described in the application, the source may not continue operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

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

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- (a) This permit, F 085-35324-00132, 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, until the renewal permit has been issued or denied.

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

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

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

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

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

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### B.7 Severability [326 IAC 2-8-4(4)]

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

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

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

### B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

### B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

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- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
  - (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
  - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

### B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

- (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.

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- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

### B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

### B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

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

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

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

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

The Permittee shall implement the PMPs.

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- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

### B.14 Emergency Provisions [326 IAC 2-8-12]

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Telephone Number: 317-233-0178 (ask for Office of Air Quality,  
Compliance and Enforcement Branch)

Facsimile Number: 317-233-6865

Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (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.

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The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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- (a) All terms and conditions of permits established prior to F 085-35324-00132 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

### B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

### B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

---

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

### B.18 Permit Renewal [326 IAC 2-8-3(h)]

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a

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certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

### B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

### B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;

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- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

### B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

### B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

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such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

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

### B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

### B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.

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- (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.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]**

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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.

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**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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

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

- (a) Opacity shall not exceed an average of 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,

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Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

## C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

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Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A.

## C.8 Stack Height [326 IAC 1-7]

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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.

## C.9 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).

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

#### C.10 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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- (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.11 Compliance Requirements [326 IAC 2-1.1-11]

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

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

#### C.12 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

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

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

#### C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

### C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

### C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

### C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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- (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.

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The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

#### C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

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

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

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

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

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

#### C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue

# DRAFT

MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

## Stratospheric Ozone Protection

### C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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## SECTION D.1

## EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) plastic product manufacturing line EU001, constructed in 2001 and modified in 2016, consisting of the following:
  - (1) Twelve (12) plastic extruders, identified as Extruders 1 through 12, with a maximum capacity of extruding 2346 pounds per hour, equipped with a dust collector for control, identified as control equipment ID 001-1 and exhausting indoors;
  - (2) Sawing operations following extrusion to size timber, with a maximum capacity of processing 2346 pounds per hour, uncontrolled and exhausting indoors;
  - (3) Plastic machining operations, including sawing, board cutting, and CNC, with a maximum capacity of processing 2250 pounds per hour of raw plastic, using a dust collector as PM control, identified as control equipment ID 001-6 and exhausting through stack 104; and
  - (4) One (1) moulder, with a maximum capacity of processing 300 pounds per hour of plastic boards, controlled by a dust collector, identified as control equipment ID 001-5, and exhausting through stack 96.
- (b) One (1) aluminum frame construction operations, identified as EU002, constructed in 2011 and modified in 2016, with a maximum capacity of 607 pounds per hour, including sawing, CNC, brake press, sanding/grinding units, using a dust collector and filter as PM control, identified as control equipment ID 002-1, and exhausting indoors.
- (c) One (1) powder coating operation, identified as EU003, constructed in 2011 and modified in 2016, with a maximum capacity of 36 pounds per hour, using a dust collector and filter as PM control, identified as control equipment ID 003-1, and exhausting indoors.
- (d) One (1) plastic painting operation, identified as EU004, approved in 2015 for construction, with a maximum capacity of 37.8 pounds of products painted per hour, using a filter as PM control, identified as control equipment ID 004-2, and exhausting to Stack 76.

### Insignificant Activities:

- (c) Plastics products design center, processing a maximum of 333.9 pounds per hour, constructed in 2001 and modified in 2016, not associated with the process line or manufacturing, controlled by a voluntary dust collector, identified as control equipment ID 001-2, exhausting out stack #23.

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

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## Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

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

- (a) The PM-10 and PM-2.5 emissions from the plastics machining operation, shall not exceed 4.0 lbs per hour, each.
- (b) The PM-10 and PM-2.5 emissions from the aluminum frame construction, shall not exceed 1.8 lbs per hour, each.
- (c) The PM-10 and PM-2.5 emissions from the powder coating operation, shall not exceed 2.8 lbs per hour, each.

Compliance with these limits, combined with the potential to emit of PM-10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM-10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable.

### D.1.2 Prevention of Significant deterioration (PSD) Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 not applicable, the source shall comply with the following:

- (a) The PM emissions from the plastics machining operation, shall not exceed 4.0 lbs per hour.
- (b) The PM emissions from the aluminum frame construction, shall not exceed 1.8 lbs per hour.

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

### D.1.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the plastic machining, aluminum frame sanding, and powder coating operations shall not exceed the following:

Operation	Process Weight (ton/hour)	Limit (lbs/hr)
Plastic Machining	1.13	4.44
Plastic Moulder	0.15	1.15
Plastic Sawing uncontrolled	1.17	4.56
Design Center with voluntary control	0.17	1.24
Framing (sanding)	0.30	1.84
Powder Coating Operations	0.32	1.92

The pound per hour limitation was calculated with the following equation:

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

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

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### D.1.4 Particulate Emission Limitations Work Practices, and Control Technologies [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from plastic painting operation EU004 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the Permittee shall operate the control device in accordance with manufacturer's specifications.

### D.1.5 Best Available Control Technology (BACT) Avoidance Limit [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements) not applicable, the Permittee shall comply with the following:

The VOC input (including cleanup solvents) to plastic painting operation, identified as EU004, shall not exceed 24.99 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit will limit the VOC emissions from the plastic painting operation to less than 25 tons per year and render 326 IAC 8-1-6 (New Facilities, General Reduction requirements) not applicable to the plastic painting operation.

### D.1.6 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

### D.1.7 Particulate Matter Control [326 IAC 2-8-4(1)]

In order to comply with Conditions D.1.1, D.1.2, D.1.3, and D.1.4, the dust collectors/dry filters for particulate control from the plastic machining, plastic moulder, framing sanding, powder coating, and plastic painting shall be in operation at all times when the associated process is in operation.

### D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC emission limitation contained in Condition D.1.5, for the plastic painting operation EU004 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

### D.1.9 Monitoring [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from each of the plastic painting operation, identified as stack 76 while the booth is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emission is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the

## DRAFT

reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

### D.1.10 Visible Emissions Notations [326 IAC 2-8-4(1)] [326 IAC 2-8-5(1)]

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- (a) Visible emission notations of dust collectors, identified as control equipment ID 001-6 and 001-5 stack exhausts shall be performed once per day during normal daylight operations. 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 a reasonable response. Section C – Response to Excursions and 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.

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

#### D.1.11 Record Keeping Requirements [326 IAC 2-8-4(3)]

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- (a) To document the compliance status with Condition D.1.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC limitation established in Condition D.1.5.
  - (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent used on monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (3) A log of the dates of use;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC usage for each month; and
  - (6) The weight of VOCs emitted for each compliance period.
- (b) To document the compliance status with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (c) To document the compliance status with Condition D.1.10 - Visible Emissions Notations, the Permittee shall maintain records of daily visible emission notations of the dust collectors stack exhaust. 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).

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

## D.1.12 Reporting Requirements [326 IAC 2-8-4(3)]

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A quarterly report of the information to document the compliance status with D.1.5 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

Source Name: Poly-Wood LLC  
Source Address: 1001 W. Brooklyn Street, Syracuse, Indiana 46567  
FESOP Permit No.: F 085-35324-00132

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

# DRAFT

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

### Quarterly Report

Source Name: Poly-Wood LLC  
Source Address: 1001 W. Brooklyn Street, Syracuse, Indiana 46567  
FESOP Permit No.: F 085-35324-00132  
Facility: EU004  
Parameter: VOC Emissions  
Limit: VOC emissions from the plastics painting operation, shall not exceed 24.99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_

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

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

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

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

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

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

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

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

**DRAFT**

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

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

Source Name: Poly-Wood LLC  
Source Address: 1001 W. Brooklyn Street, Syracuse, Indiana 46567  
FESOP Permit No.: F 085-35324-00132

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12</li></ul> |
|--|

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

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

**DRAFT**

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

**Page 2 of 2**

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

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

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

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

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

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

Source Name: Poly-Wood LLC  
Source Address: 1001 W. Brooklyn Street, Syracuse, Indiana 46567  
FESOP Permit No.: F 085-35324-00132

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

Page 1 of 2

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

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

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

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

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

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

# DRAFT

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

Poly-Wood LLC  
1001 W. Brooklyn Street  
Syracuse, Indiana 46567

## Affidavit of Construction

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

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that Poly-Wood LLC, located at 1001 W. Brooklyn Street, Syracuse, Indiana 46567, has constructed and will operate a plastic extrusion and metal and plastic surface coating plant on in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on January 7, 2015 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F 085-35324-00132, Plant ID No. 08-00132 issued on \_\_\_\_\_.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature \_\_\_\_\_  
Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana  
on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_. My Commission expires: \_\_\_\_\_.

Signature \_\_\_\_\_  
Name \_\_\_\_\_ (typed or printed)

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

Technical Support Document (TSD) for a Significant Permit Revision to a  
Federally Enforceable State Operating Permit (FESOP)

**Source Description and Location**

**Source Name:** Poly-Wood LLC  
**Source Location:** 1001 W. Brooklyn Street, Syracuse, IN 46567  
**County:** Kosciusko  
**SIC Code:** 2519 (Household Furniture, NEC)  
**Operation Permit No.:** F 085-35324-00132  
**Operation Permit Issuance Date:** May 19, 2015  
**Significant Permit Revision No.:** 085-37003-00132  
**Permit Reviewer:** Monica Dick

On March 28, 2016, the Office of Air Quality (OAQ) received an application from Poly-Wood LLC related to a revision to an existing household furniture manufacturing source.

**Existing Approvals**

The source was issued FESOP No. F085-35324-00132, issued on May 19, 2015. The source has since received the following approval:

- (a) Administrative Amendment No. 085-36303-00132, issued on October 6, 2015.

**County Attainment Status**

The source is located in Kosciusko County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

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

- (b) **PM<sub>2.5</sub>**  
 Kosciusko County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**  
 Kosciusko County has been classified as attainment or unclassifiable in Indiana for all other 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.

**Status of the Existing Source**

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

This PTE table is from the TSD or Appendix A of F085-35324-00132, issued on May 19, 2015.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM10*	PM2.5*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Combustion	0.13	0.52	0.52	0.04	6.84	0.38	5.75	0.12	0.13
Plastic Extrusion	0.28	0.28	0.28	0.00	0.00	0.20	0.00	0.20	0.20
Plastic Machining	0.27	0.27	0.27	0.00	0.00	0.00	0.00	0.00	0.00
Welding	0.02	0.02	0.02	0.00	0.00	0.00	0.00	0.00	0.00
Blowing Agent	0.00	0.00	0.00	0.00	13.69	0.00	13.69	0.00	0.00
Frame Construction (Sanding)	1.06	1.06	1.06	0.00	0.00	0.00	0.00	0.00	0.00
Powder Coating	0.54	0.54	0.54	0.00	0.00	0.00	0.00	0.00	0.00
Plastic Painting	0.95	0.95	0.95	0.00	0.00	32.22	0.00	0.00	0.00
<b>Total PTE of Entire Source</b>	<b>3.25</b>	<b>3.64</b>	<b>3.64</b>	<b>0.04</b>	<b>20.53</b>	<b>32.22</b>	<b>19.44</b>	<b>0.33</b>	<b>0.20</b>
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".									

- (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 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 63.41, because the unlimited potential to emit HAPs is 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).

<b>Description of Proposed Revision</b>
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The Office of Air Quality (OAQ) has reviewed an application, submitted by Poly-Wood LLC on March 28, 2016, relating to new equipment including the plastic extruders, ovens, comfort heating and ventilation equipment, which modified existing operations and increased throughput associated with the plastic product manufacturing line, aluminum frame construction operation, powder coating, and natural gas combustion.

The following is a list of the modified emission units and pollution control devices:

- (a) One (1) plastic product manufacturing line EU001, ~~including eight (8) plastic extruders, identified as Extruders 1 through 8, sawing and CNC operations, constructed in 2001 and modified in 2016, consisting of the following: each with a maximum capacity of 162.5 pounds per hour, using a baghouse as PM control, and exhausting indoors.~~
  - (1) **Twelve (12) plastic extruders, identified as Extruders 1 through 12, with a maximum capacity of extruding 2346 pounds per hour, equipped with a dust collector for control, identified as control equipment ID 001-1 and exhausting indoors;**
  - (2) **Sawing operations following extrusion to size timber, with a maximum capacity of processing 2346 pounds per hour, uncontrolled and exhausting indoors;**
  - (3) **Plastic machining operations, including sawing, board cutting, and CNC, with a maximum capacity of processing 2250 pounds per hour of raw plastic, using a dust collector as PM control, identified as control equipment ID 001-6 and exhausting through stack 104; and**
  - (4) **One (1) moulder, with a maximum capacity of processing 300 pounds per hour of plastic boards, controlled by a dust collector, identified as control equipment ID 001-5, and exhausting through stack 96.**
- (b) One (1) aluminum frame construction operations, identified as EU002, constructed in 2011 **and modified in 2016**, with a maximum capacity of ~~337.35~~ **607** pounds per hour, including sawing, CNC, brake press, ~~welding~~, sanding/grinding units, using a dust collector and filter as PM control, **identified as control equipment ID 002-1**, and exhausting indoors.
- (c) One (1) powder coating operation, identified as EU003, constructed in 2011 **and modified in 2016**, with a maximum capacity of ~~20.0~~ **36** pounds per hour, ~~including a heated wash, coating, and oven~~, using a dust collector and filter as PM control, **identified as control equipment ID 003-1**, and exhausting indoors.

...

Insignificant activities:

- (a) **Eight one (81) ~~Seventy-nine (79)~~ natural gas combustion units, constructed in 2011 and modified in 2016, consisting of a total heat input capacity of 6.02 MMBTU per hour for comfort heating units, 1.5 MMBTU per hour for heating the powder coating washers, and process ovens totaling 4.54 MMBtu per hour, ~~constructed in 2011 with a total heat input capacity of 12.14 mmbTU per hour.~~**
- (b) Two (2) portable diesel-fired emergency generators, constructed in 2001, rated at 10 hp each. **[Non-road Engines]**  
  
**Under 40 CFR 63, Subpart ZZZZ, these non-stationary generators are exempt  
Under 40 CFR 60, Subpart IIII, these non-stationary generators are exempt**
- (c) **Plastics products design center, processing a maximum of 333.9 pounds per hour, constructed in 2001 and modified in 2016, not associated with the process line or manufacturing, controlled by a voluntary dust collector, identified as control equipment ID 001-2, exhausting out stack #23.**
- (d) **Plastics products hand held tools including routers for plastics machining processing a maximum of 1,499 pounds per hour, constructed in 2001 and modified in 2016.**
- (e) **Plastics products mixer, processing 2,346 pounds per hour, enclosed process with pneumatic conveyance to extruder, constructed in 2001 and modified in 2016.**
- (f) **Plastics products raw plastics storage, pneumatic conveying a maximum of 2,250 pounds per hour to the mixer, constructed in 2001 and modified in 2016, voluntary dust collector for recycle fine collection, identified as control equipment ID 001-1, exhausting indoors.**
- (g) **Process washers for powder coating using non-VOC and Non-HAP liquids, constructed in 2011 and modified in 2016.**
- (h) **Welding operations, constructed in 2011 and modified in 2016, exhausting indoors, consisting of the following:**
  - (1) **Seven (7) MIG welding cells with a maximum capacity of using 0.25 pounds per hour of wire; and**
  - (2) **Five (5) TIG welding cells with a maximum capacity of using 0.41 pounds per hour of wire.**

<b>“Integral Part of the Process” Determination</b>
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As part of the initial FESOP, F085-35324-00132, issued on May 19, 2015, IDEM, OAQ previously determined that dust collectors are not an integral part of the frame sanding and powder coating process.

IDEM, OAQ is not reevaluating this integral justification at this time. Therefore, the potential particulate emissions from the frame sanding and powder coating process will continue to be calculated before consideration of the dust collectors for purposes of determining permitting level and 326 IAC 6-3 applicability.

**Enforcement Issues**

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – FESOP Revision**

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 Permit Revisions. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Plastic product manufacturing line, identified as EU001:									
Plastic Extrusion	0.23	0.23	0.23	-	10.95	0.16	10.95	0.16	0.16
Saws	6.37	3.37	1.88	-	-	-	-	-	-
Plastic Machining	45.82	45.82	45.82	-	-	-	-	-	-
Moulder	14.66	7.75	4.32	-	-	-	-	-	-
Aluminum frame construction operation, identified as EU002:									
Framing (Sanding)	84.94	84.94	84.94	-	-	-	-	-	-
Powder Coating, EU003	35.04	35.04	35.04	-	-	-	-	-	-
Insignificant Activities:									
Combustion	0.05	0.18	0.18	0.01	2.41	0.13	2.02	0.04	0.05
Design center	3.07	1.63	0.91	-	-	-	-	-	-
Hand held tools including routing tables	0.74	0.39	0.22	-	-	-	-	-	-
Welding	0.07	0.07	0.07	-	-	-	-	-	-
<b>Total</b>	<b>190.98</b>	<b>179.41</b>	<b>173.60</b>	<b>0.01</b>	<b>13.36</b>	<b>0.30</b>	<b>12.97</b>	<b>0.21</b>	<b>0.21</b>
negl. = negligible									

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves the construction of new emission units and increases the operational capacity of existing units with potential to emit greater than or equal to twenty-five (25) tons per year of PM, PM10, or direct PM2.5.

Pursuant to 326 IAC 2-8-11.1(f), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves the adjustment and addition of FESOP and PSD minor limits.

**PTE of the Entire Source After Issuance of the FESOP Revision**

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM10*	PM2.5*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	(Hexane) Worst Single HAP
Combustion	0.13	<del>0.52</del>	<del>0.52</del>	0.04	<del>6.84</del>	0.38	5.75	0.12	0.13
Plastic Extrusion	0.28	<del>0.28</del>	<del>0.28</del>	0.00	0.00	0.20	0.00	0.20	0.20
Plastic Machining	0.27	<del>0.27</del>	<del>0.27</del>	0.00	0.00	0.00	0.00	0.00	0.00
Welding	0.02	<del>0.02</del>	<del>0.02</del>	0.00	0.00	0.00	0.00	0.00	0.00
Blowing Agent	0.00	0.00	0.00	0.00	<del>13.69</del>	0.00	<del>13.69</del>	0.00	0.00
Frame Construction (Sanding)	1.06	1.06	1.06	0.00	0.00	0.00	0.00	0.00	0.00
Powder Coating	0.54	0.54	0.54	0.00	0.00	0.00	0.00	0.00	0.00
Plastic Painting	0.95	0.95	0.95	0.00	0.00	<del>32.22</del>	0.00	0.00	0.00
<b>Plastic product manufacturing line, EU001:</b>									
Plastic Extrusion	<b>0.51</b>	<b>0.51</b>	<b>0.51</b>	-	<b>24.64</b>	<b>0.36</b>	<b>24.64</b>	<b>0.20</b>	<b>0.20</b>
Saws	<b>6.37</b>	<b>3.37</b>	<b>1.88</b>	-	-	-	-	-	-
Plastic Machining	<b>17.52</b>	<b>17.52</b>	<b>17.52</b>	-	-	-	-	-	-
Moulder	<b>14.66</b>	<b>7.75</b>	<b>4.32</b>	-	-	-	-	-	-
<b>Aluminum frame construction operation, EU002:</b>									
Framing (Sanding)	<b>7.88</b>	<b>7.88</b>	<b>7.88</b>	-	-	-	-	-	-
Powder Coating EU003	<b>78.84</b>	<b>12.26</b>	<b>12.26</b>	-	-	-	-	-	-
Plastic Painting EU004	<b>41.13</b>	<b>41.13</b>	<b>41.13</b>	-	-	<b>24.99</b>	-	-	-
<b>Insignificant Activities:</b>									
Combustion	<b>0.18</b>	<b>0.70</b>	<b>0.70</b>	<b>0.06</b>	<b>9.26</b>	<b>0.51</b>	<b>7.77</b>	<b>0.17</b>	<b>0.17</b>
Design center	<b>3.07</b>	<b>1.63</b>	<b>0.91</b>	-	-	-	-	-	-
Hand held tools including routing tables	<b>0.74</b>	<b>0.39</b>	<b>0.22</b>	-	-	-	-	-	-
Welding	<b>0.09</b>	<b>0.01</b>	<b>0.01</b>	-	-	-	-	-	-
Total PTE of Entire Source	<del><b>3.25</b></del> <b>170.77</b>	<del><b>3.64</b></del> <b>92.93</b>	<del><b>3.64</b></del> <b>87.12</b>	<del><b>0.04</b></del> <b>0.06</b>	<del><b>20.53</b></del> <b>33.89</b>	<del><b>32.22</b></del> <b>25.70</b>	<del><b>19.44</b></del> <b>32.41</b>	<del><b>0.33</b></del> <b>0.37</b>	<del><b>0.20</b></del> <b>0.37</b>
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".									

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM10*	PM2.5*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	(Hexane) Worst Single HAP
Plastic product manufacturing line, EU001:									
Plastic Extrusion	0.51	0.51	0.51	-	24.64	0.36	24.64	0.20	0.20
Saws	6.37	3.37	1.88	-	-	-	-	-	-
Plastic Machining	17.52	17.52	17.52	-	-	-	-	-	-
Moulder	14.66	7.75	4.32	-	-	-	-	-	-
Aluminum frame construction operation, EU002:									
Framing (Sanding)	7.88	7.88	7.88	-	-	-	-	-	-
Powder Coating EU003	78.84	12.26	12.26	-	-	-	-	-	-
Plastic Painting EU004	41.13	41.13	41.13	-	-	24.99	-	-	-
Insignificant Activities:									
Combustion	0.18	0.70	0.70	0.06	9.26	0.51	7.77	0.17	0.17
Design center	3.07	1.63	0.91	-	-	-	-	-	-
Hand held tools including routing tables	0.74	0.39	0.22	-	-	-	-	-	-
Welding	0.09	0.01	0.01	-	-	-	-	-	-
<b>Total PTE of Entire Source</b>	<b>170.77</b>	<b>92.93</b>	<b>87.12</b>	<b>0.06</b>	<b>33.89</b>	<b>25.70</b>	<b>32.41</b>	<b>0.37</b>	<b>0.37</b>
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".									

(a) FESOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants, and HAPs from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

(1) Criteria Pollutants

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

- ~~(1) The PM-10 and PM-2.5 emissions from the Plastic Machining, powder coating and plastic painting operation shall be limited to less than 95.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.~~
- ~~(2) The PM emissions from the Plastic Machining, powder coating and plastic painting operation shall be limited to less than 245.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.~~
- (1) The PM-10 and PM-2.5 emissions from the plastics machining operation, shall not exceed 4.0 lbs per hour, each.**
- (2) The PM-10 and PM-2.5 emissions from the aluminum frame construction, shall not exceed 1.8 lbs per hour, each.**
- (3) The PM-10 and PM-2.5 emissions from the powder coating operation, shall not exceed 2.8 lbs per hour, each.**

Compliance with these limits, combined with the potential to emit of PM-10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM-10 and PM2.5, each to less than 100 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable.

This is a revised limit. The PM10 and PM2.5 FESOP was not practicably enforceable. The limit has been revised to include a technically accurate limitation, time period, and method of determining, monitoring, record keeping and reporting compliance.

(b) PSD Minor Source – PM

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit PM from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

- ~~(1) The PM-10 and PM-2.5 emissions from the Plastic Machining, powder coating and plastic painting operation shall be limited to less than 95.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.~~
- ~~(2) The PM emissions from the Plastic Machining, powder coating and plastic painting operation shall be limited to less than 245.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.~~
- (1) The PM emissions from the plastics machining operation, shall not exceed 4.0 lbs per hour.**
- (2) The PM emissions from the aluminum frame construction, shall not exceed 1.8 lbs per hour.**

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per twelve (12) consecutive month period and shall render the

requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

This is a revised limit. The PM minor PSD limit was not practicably enforceable. The limit has been revised to include a technically accurate limitation, time period, and method of determining, monitoring, record keeping and reporting compliance.

### Federal Rule Applicability Determination

#### New Source Performance Standards (NSPS)

(a) **40 CFR 60, Subpart IIII - New Source Performance Standard for Stationary Compression Ignition Internal Combustion Engines**

The requirements of the New Source Performance Standard for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII are not included in the permit for the two (2) portable diesel generator/engines.

Pursuant to 40 CFR 60.4219, stationary internal combustion engines (ICE) differ from mobile ICE in that a stationary internal combustion engine is not a nonroad engine as defined at 40 CFR 1068.30 (excluding paragraph (2)(ii) of that definition). 40 CFR 1068.30 defines a non-road engine as any internal combustion engine that, by itself or in or on a piece of equipment, is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Indicia of transportability include, but are not limited to, wheels, skids, carrying handles, dolly, trailer, or platform.

However, 40 CFR 1068.30 also requires that a non-road engine, as defined in the previous paragraph, not remain at a site for more than twelve (12) consecutive months. Any engine (or engines) that replace the engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in calculating the consecutive time period. Additionally, 40 CFR 1068.30 defines a location as any single site at a building, structure, facility, or installation.

Therefore, provided that the two (2) portable diesel generator/engines do not remain at one site for a period greater than twelve (12) months, each shall meet the definition of nonroad engines and not be subject to the requirements of 40 CFR 60, Subpart IIII.

(b) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed revision.

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

(c) **40 CFR 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants: Stationary Reciprocating Internal Combustion Engines**

The requirements of the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ, are not included in the permit for the two (2) portable diesel generator/engines.

Pursuant to 40 CFR 63.6585(a), stationary reciprocating internal combustion engines (RICE) differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30. 40 CFR 1068.30 defines a non-road engine as any internal combustion engine that, by itself or in or on a piece of equipment, is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Indicia of transportability include, but are not limited to, wheels, skids, carrying handles, dolly, trailer, or platform.

However, 40 CFR 1068.30 also requires that a nonroad engine, as defined in the previous paragraph, not remain at a site for more than twelve (12) consecutive months. Any engine (or engines) that replace the engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in calculating the consecutive time period. Additionally, 40 CFR 1068.30 defines a location as any single site at a building, structure, facility, or installation.

Therefore, provided that the two (2) portable diesel generator/engines do not remain at one site for a period greater than twelve (12) months, each shall meet the definition of a nonroad engine and not be subject to the requirements of 40 CFR 63, Subpart ZZZZ.

- (d) There are no National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included for this proposed revision.

#### Compliance Assurance Monitoring (CAM)

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

<b>State Rule Applicability Determination</b>
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#### 326 IAC 2-8-4 (FESOP)

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

#### 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

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

The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the modified units is 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.

#### 326 IAC 12 (New Source Performance Standards)

See Federal Rule Applicability Section of this TSD.

#### 326 IAC 20 (Hazardous Air Pollutants)

See Federal Rule Applicability Section of this TSD.

#### 326 IAC 8 (Volatile Organic Compounds)

Pursuant to 326 IAC 8-1-6, the plastic painting operation, identified as EU004 is a new facility (constructed after January 1, 1980), has the potential to emit greater than 15 pounds per day and 25 tons per year, and is not otherwise limited by 326 IAC 8 rules. However, the source has chosen to take a limit of less than 25 tons per year based on the coating content of pounds VOC per gallon.

In order to make 326 IAC 8-1-6 not applicable, VOC input (including cleanup solvents) to plastic

painting operation, identified as EU004, shall not exceed 24.99 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

This is a new requirement.

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

- (a) Pursuant to 326 IAC 6-3-1(b)(14), the extruders, mixer, raw plastic storage, plastics hand held tools, and welding each have a PTE less than 0.551 lb/hr. Therefore, these emission units are exempt from the requirements of 326 IAC 6-3.
- (b) Pursuant to 326 IAC 6-3-1(b)(13), plastic hand tools including routers are exempt from 326 IAC 6-3, because they meet the definition of trivial activities at 326 IAC 2-7-1(42)(H).
- (c) Pursuant to 326 IAC 6-3-2(e), manufacturing processes including plastics machining, moulders, saws, design center, aluminum sanding, and powder coating with process weight rate equal to or greater than 100 pound per hour, shall be limited by the applicable equation listed in to 326 IAC 6-3-2(e)(3).

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate shall not exceed pounds per hour listed when operating at a process weight rate listed as follows:

<b>Operation</b>	<b>Process Weight (ton/hour)</b>	<b>Limit (lbs/hr)</b>
Plastic Machining	1.13	4.44
Plastic Moulder	0.15	1.15
Plastic Sawing uncontrolled	1.17	4.56
Design Center with voluntary control	0.17	1.24
Framing (sanding)	0.30	1.84
Powder Coating Operations	0.32	1.92

The pounds per hour limitation was calculated with the following equation:

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

$$E = 4.10 P^{0.67}$$

Where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

The dust collectors, identified as control equipment ID 001-6 and 001-5 shall be in operation at all times the Emission unit is in operation, in order to comply with this limit.

**326 IAC 6-3-2 (Particulate Emission Limitations for Work Practices and Control Technologies)**

Pursuant to 326 IAC 6-3-2(d), particulate from the plastics painting operation, shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**Compliance Determination, Monitoring and Testing Requirements**

- (a) The compliance determination and monitoring requirements applicable to this proposed revision are as follows:

Emission Unit/Control	Operating Parameters	Frequency
plastics machining operations / control equipment ID 001-6	visible emission notations	daily
plastics moulder / control equipment ID 001-5		

- (b) The compliance monitoring requirements applicable to the plastic painting operation is as follows:

Emission Units	Frequency	Parameters
plastic painting operation / control equipment ID 004-1	Daily	Inspections shall be performed to verify placement, integrity and particle loading of the dry filters.
	Weekly	Observations of the overspray from the surface coating booth stacks, while one or more booths are in operation.
	Monthly	Observations of the coating emission from the stacks, and presence of overspray on rooftops and nearby ground.

These monitoring conditions are necessary because the dust collectors and dry filters for the plastics machining operations, plastic moulder, design center, framing (sanding), powder coating and plastic painting operation must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes), 326 IAC 2-8 (FESOP), 326 IAC 2-2 (Prevention of Significant Deterioration) minor limits.

- (c) Testing is not required for this source for reasons as follows:
- (1) The sawing and design center has potential particulate emissions, less than 50% of the allowable particulate emission. Therefore, control devices are not necessary to comply with the requirements of 326 IAC 6-3-2 limits for these units.
  - (2) The framing and powder coating exhaust indoors and comply with the applicable 326 IAC 6-3 PM limit, 326 IAC 2-8 PM/PM10/PM2.5 limit, and 326 IAC 2-2 minor PM/PM10/PM2.5 limit with controls at 85% efficiency or less; and
  - (3) The plastics machining and plastics moulder comply can comply with the applicable 326 IAC 6-3 PM limit, 326 IAC 2-8 PM/PM10/PM2.5 limit, and 326 IAC 2-2 minor PM/PM10/PM2.5 limit with controls at 85% efficiency or less.

**Proposed Changes**

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

- (1) On March 28, 2016, Poly-Wood LLC submitted an application to revise their FESOP to address new equipment at the source including four new plastic extruders, ovens, comfort heating, and ventilation equipment, which modified existing operations and increased throughput associated with the plastic product manufacturing line, aluminum frame construction operation, powder coating, and natural gas combustion. Additionally, given the increased throughput the source has

chosen to accept PM, PM10 and PM2.5 limits on additional units to accommodate the revision. Condition A.2, A.3 and Section D.1 has been modified to include new equipment and increased throughput as follows:

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

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

- (a) One (1) plastic product manufacturing line EU001, ~~including eight (8) plastic extruders, identified as Extruders 1 through 8, sawing and CNC operations, constructed in 2001 and modified in 2016, consisting of the following: each with a maximum capacity of 162.5 pounds per hour, using a baghouse as PM control, and exhausting indoors.~~
  - (1) **Twelve (12) plastic extruders, identified as Extruders 1 through 12, with a maximum capacity of extruding 2346 pounds per hour, equipped with a dust collector for control, identified as control equipment ID 001-1 and exhausting indoors;**
  - (2) **Sawing operations following extrusion to size timber, with a maximum capacity of processing 2346 pounds per hour, uncontrolled and exhausting indoors;**
  - (3) **Plastic machining operations, including sawing, board cutting, and CNC, with a maximum capacity of processing 2250 pounds per hour of raw plastic, using a dust collector as PM control, identified as control equipment ID 001-6 and exhausting through stack 104; and**
  - (4) **One (1) moulder, with a maximum capacity of processing 300 pounds per hour of plastic boards, controlled by a dust collector, identified as control equipment ID 001-5, and exhausting through stack 96.**
- (b) One (1) aluminum frame construction operations, identified as EU002, constructed in 2011 **and modified in 2016**, with a maximum capacity of ~~337.35~~ **607** pounds per hour, including sawing, CNC, brake press, ~~welding~~, sanding/grinding units, using a dust collector and filter as PM control, **identified as control equipment ID 002-1**, and exhausting indoors.
- (c) One (1) powder coating operation, identified as EU003, constructed in 2011 **and modified in 2016**, with a maximum capacity of ~~20.0~~ **36** pounds per hour, ~~including a heated wash, coating, and oven,~~ using a dust collector and filter as PM control, **identified as control equipment ID 003-1**, and exhausting indoors.

...

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

This stationary source also includes the following insignificant activities:

- (a) **Eight one (81) ~~Seventy nine (79)~~ natural gas combustion units, constructed in 2011 and modified in 2016, consisting of a total heat input capacity of 6.02 MMBTU per hour for comfort heating units, 1.5 MMBTU per hour for heating the powder coating washers, and process ovens totaling 4.54 MMBtu per hour, constructed in 2011 with a total heat input capacity of 12.14 mMBTU per hour.**
- ...
- (c) **Plastics products design center, processing a maximum of 333.9 pounds per hour, constructed in 2001 and modified in 2016, not associated with the process line or manufacturing, controlled by a voluntary dust collector, identified as control equipment ID 001-2, exhausting out stack #23.**

- (d) **Plastics products hand held tools including routers for plastics machining processing a maximum of 1,499 pounds per hour, constructed in 2001 and modified in 2016.**
- (e) **Plastics products mixer, processing 2,346 pounds per hour, enclosed process with pneumatic conveyance to extruder, constructed in 2001 and modified in 2016.**
- (f) **Plastics products raw plastics storage, pneumatic conveying a maximum of 2,250 pounds per hour to the mixer, constructed in 2001 and modified in 2016, voluntary dust collector for recycle fine collection, identified as control equipment ID 001-1, exhausting indoors.**
- (g) **Process washers for powder coating using non-VOC and Non-HAP liquids, constructed in 2011 and modified in 2016.**
- (h) **Welding operations, constructed in 2011 and modified in 2016, exhausting indoors, consisting of the following:**
  - (1) **Seven (7) MIG welding cells with a maximum capacity of using 0.25 pounds per hour of wire; and**
  - (2) **Five (5) TIG welding cells with a maximum capacity of using 0.41 pounds per hour of wire.**

...

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

##### Emissions Unit Description:

- (a) **One (1) plastic product manufacturing line EU001, including eight (8) plastic extruders, identified as Extruders 1 through 8, sawing and CNC operations, constructed in 2001 and modified in 2016, consisting of the following: each with a maximum capacity of 162.5 pounds per hour, using a baghouse as PM control, and exhausting indoors.**
  - (1) **Twelve (12) plastic extruders, identified as Extruders 1 through 12, with a maximum capacity of extruding 2346 pounds per hour, equipped with a dust collector for control, identified as control equipment ID 001-1 and exhausting indoors;**
  - (2) **Sawing operations following extrusion to size timber, with a maximum capacity of processing 2346 pounds per hour, uncontrolled and exhausting indoors;**
  - (3) **Plastic machining operations, including sawing, board cutting, and CNC, with a maximum capacity of processing 2250 pounds per hour of raw plastic, using a dust collector as PM control, identified as control equipment ID 001-6 and exhausting through stack 104; and**
  - (4) **One (1) moulder, with a maximum capacity of processing 300 pounds per hour of plastic boards, controlled by a dust collector, identified as control equipment ID 001-5, and exhausting through stack 96.**
- (b) **One (1) aluminum frame construction operations, identified as EU002, constructed in 2011 and modified in 2016, with a maximum capacity of 337.35 607 pounds per hour,**

	including sawing, CNC, brake press, <del>welding</del> , sanding/grinding units, using a dust collector and filter as PM control, <b>identified as control equipment ID 002-1</b> , and exhausting indoors.
(c)	One (1) powder coating operation, identified as EU003, constructed in 2011 <b>and modified in 2016</b> , with a maximum capacity of <del>20.0</del> <b>36</b> pounds per hour, <del>including a heated wash, coating, and oven</del> , using a dust collector and filter as PM control, <b>identified as control equipment ID 003-1</b> , and exhausting indoors.
(d)	One (1) plastic painting operation, identified as EU004, approved in 2015 for construction, with a maximum capacity of 37.8 pounds of products painted per hour, using a filter as PM control, <b>identified as control equipment ID 004-2</b> , and exhausting to Stack 476.
<b>Insignificant Activities:</b>	
(c)	<b>Plastics products design center, processing a maximum of 333.9 pounds per hour, constructed in 2001 and modified in 2016, not associated with the process line or manufacturing, controlled by a voluntary dust collector, identified as control equipment ID 001-2, exhausting out stack #23.</b>
...	

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

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

- ~~(1) The PM-10 and PM-2.5 emissions from the Plastic Machining, powder coating and plastic painting operation shall be limited to less than 95.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.~~
- ~~(2) The PM emissions from the Plastic Machining, powder coating and plastic painting operation shall be limited to less than 245.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.~~
- (a) The PM-10 and PM-2.5 emissions from the plastics machining operation, shall not exceed 4.0 lbs per hour, each.**
- (b) The PM-10 and PM-2.5 emissions from the aluminum frame construction, shall not exceed 1.8 lbs per hour, each.**
- (c) The PM-10 and PM-2.5 emissions from the powder coating operation, shall not exceed 2.8 lbs per hour, each.**

Compliance with these limits, combined with the potential to emit of ~~PM~~, PM-10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM-10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, ~~and PM to less than 250 tons per twelve (12) consecutive month period~~, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), and ~~326 IAC 2-2 (Prevention of Significant Deterioration (PSD))~~, not applicable.

##### D.1.2 Prevention of Significant deterioration (PSD) Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 not applicable, the source shall comply with the following:

- (a) The PM emissions from the plastics machining operation, shall not exceed 4.0 lbs per hour.
- (b) The PM emissions from the aluminum frame construction, shall not exceed 1.8 lbs per hour.

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

**D.1.23 Particulate Emission Limitations for Manufacturing Processes Matter [326 IAC 6-3-2]**

- (a) Pursuant to 326 IAC 6-3-2(e), the particulate matter (PM) from the plastic machining, aluminum frame sanding, and powder coating operations shall not exceed **the following:** 2.99, 1.24, and 0.19 pounds per hour when operating at a process weight rate of 0.625, 0.17, and 0.01 tons per hour, respectively.

Operation	Process Weight (ton/hour)	Limit (lbs/hr)
Plastic Machining	1.13	4.44
Plastic Moulder	0.15	1.15
Plastic Sawing uncontrolled	1.17	4.56
Design Center with voluntary control	0.17	1.24
Framing (sanding)	0.30	1.84
Powder Coating Operations	0.32	1.92

The pound per hour limitation was calculated with the following equation:

...

- (b) Pursuant to 326 IAC 6-3-2(d), particulate from plastic surface coating operation EU004 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**D.1.4 Particulate Emission Limitations Work Practices, and Control Technologies [326 IAC 6-3-2(d)]**

Pursuant to 326 IAC 6-3-2(d), particulate from plastic painting operation EU004 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the Permittee shall operate the control device in accordance with manufacturer's specifications.

...

**D.1.67 Particulate Matter Control [326 IAC 2-8-4(1)]**

In order to comply with Conditions D.1.1 and D.1.2, **D.1.3, and**, the dust collectors/dry filters for particulate control from the plastic machining, **plastic moulder**, aluminum frame framing sanding, and the powder coating operations, and **plastic painting** shall be in operation at all times when the associated process is in operation.

...

**D.1.10 Visible Emissions Notations [326 IAC 2-8-4(1)] [326 IAC 2-8-5(1)]**

- (a) Visible emission notations of dust collectors, identified as control equipment ID 001-6 and 001-5 stack exhausts shall be performed once per day during normal daylight operations. 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 a reasonable response. Section C – Response to Excursions and 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.

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

**D.1.911 Record Keeping Requirements [326 IAC 2-8-4(3)]**

---

- (c) To document the compliance status with Condition D.1.10 - Visible Emissions Notations, the Permittee shall maintain records of daily visible emission notations of the dust collectors stack exhaust. 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).

...  
**Additional Changes**

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

**Change 1:** IDEM revised Conditions A.1, A.2(d) and A.3 to provide additional detail associated with the General Information and facility descriptions as follows:

A.1 General Information [326 IAC 2-8-3(b)]

---

...  
SIC Code: 2519 (**Household Furniture, NEC**)  
...

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

---

- (d) One (1) plastic painting operation, identified as EU004, approved in 2015 for construction, with a maximum capacity of 37.8 pounds of products painted per hour, using a filter as PM control, **identified as control equipment ID 004-2**, and exhausting to Stack 476.

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

---

- (b) Two (2) portable diesel-fired emergency generators, constructed in 2001, each rated at 10 hp. [**Non – Road Engines**]

**Under 40 CFR 63, Subpart ZZZZ, these non-stationary generators are exempt  
Under 40 CFR 60, Subpart IIII, these non-stationary generators are exempt**

...

**Change 2:** IDEM added the rule citation 326 IAC 2-8-4(1) to the Compliance Determination Requirements subsection title in Section D. 1 to clarify the authority of these conditions.

#### **SECTION D.1**

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

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

**Change 3:** IDEM revised the required volatile organic compound limits. The 326 IAC 8-2 rules for the painting of wood and metal furniture does not apply because only plastic furniture is painted in emission unit EU004. Therefore, Section D.1 has been revised and a report form has been added to address 326 IAC 8-1-6 and the conditions have been renumbered as follows:

...

#### **D.1.5 Best Available Control Technology (BACT) Avoidance Limit [326 IAC 8-1-6]**

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**In order to render the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements) not applicable, the Permittee shall comply with the following:**

**The VOC input (including cleanup solvents) to plastic painting operation, identified as EU004, shall not exceed 24.99 tons per twelve (12) consecutive month period with compliance determined at the end of each month.**

**Compliance with this limit will limit the VOC emissions from the plastic painting operation to less than 25 tons per year and render 326 IAC 8-1-6 (New Facilities, General Reduction requirements) not applicable to the plastic painting operation.**

#### ~~D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-6]~~

---

~~Pursuant to 326 IAC 8-2-6 (VOC: Metal Furniture Coating Operations) the owner or operator of the surface coating line EU004 may not cause, allow, or permit the discharge into the atmosphere of any VOC in excess of thirty-six hundredths (0.36) kilogram per liter of coating (three and zero-tenths (3.0) pounds per gallon) excluding water, delivered to the coating applicator from prime and topcoat or single coat operations.~~

#### ~~D.1.4 Volatile Organic Compounds [326 IAC 8-2-12]~~

---

~~326 IAC 8-2-12 (VOC: Wood Furniture and Cabinet Coating) the owner or operator of the surface coating line EU004 involved in wood furniture coating operation shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) or more of the following application systems: airless spray application system, air-assisted airless spray application system, electrostatic spray application system, electrostatic bell or disc application system, heated airless spray application system, roller coat, brush or wipe application system or dip and drain application system.~~

...

#### **D.1.89 Monitoring [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]**

---

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for EU004. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from each of the ~~Surface Coating~~ **plastic painting** operation, identified as ~~EU004~~ **stack 76** while the booth is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When **there is** a noticeable change in overspray emissions, or **when** evidence of overspray emission is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

...

#### **D.1.911 Record Keeping Requirements [326 IAC 2-8-4(3)]**

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~~(a) To document the compliance status with Condition D.1.3 for the plastic coating booth EU004, the Permittee shall maintain daily records in accordance with (1) below. Records maintained for (1) shall be taken as stated below and shall be complete and sufficient to establish the compliance status with the VOC limit in Condition D.1.3.~~

~~(1) The VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~

**(a) To document the compliance status with Condition D.1.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC limitation established in Condition D.1.5.**

**(1) The VOC content of each coating material and solvent used.**

**(2) The amount of coating material and solvent used on monthly basis.**

**(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**

**(3) A log of the dates of use;**

**(4) The cleanup solvent usage for each month;**

**(5) The total VOC usage for each month; and**

**(6) The weight of VOCs emitted for each compliance period.**

(b) To document the compliance status with Condition D.1.89, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

...

#### **D.1.12 Reporting Requirements [326 IAC 2-8-4(3)]**

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**A quarterly report of the information to document the compliance status with D.1.5 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

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

**Quarterly Report**

**Source Name:** Poly-Wood LLC  
**Source Address:** 1001 W. Brooklyn Street, Syracuse, Indiana 46567  
**FESOP Permit No.:** F 085-35324-00132  
**Facility:** EU004  
**Parameter:** VOC Emissions  
**Limit:** VOC emissions from the plastics painting operation, shall not exceed 24.99 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

**QUARTER:** \_\_\_\_\_ **YEAR:** \_\_\_\_\_

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

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

**Submitted by:** \_\_\_\_\_  
**Title / Position:** \_\_\_\_\_  
**Signature:** \_\_\_\_\_  
**Date:** \_\_\_\_\_  
**Phone:** \_\_\_\_\_

...

**Change 4:** Section E.1 and E.2 have been deleted from the permit because the emission units in these sections are considered Non-road engines. The two (2) portable diesel-fired emergency generators meet the definition of a nonroad engine, as defined in 40 CFR 1068.30 (excluding paragraph (2)(ii) of that definition) and are therefore not considered a stationary internal combustion engine as defined in 40 CFR 60.4219.

**~~SECTION E.1—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines [326 IAC 12] [40 CFR Part 60, Subpart IIII]~~**

**~~Emissions Unit Description: Insignificant Activities:~~**

~~Two (2) portable diesel-fired emergency generators, constructed in 2001, rated at 10 hp each.~~

~~Under 40 CFR 60, Subpart IIII, these non-stationary generators are exempt.~~

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

**~~New Source Performance Standards (NSPS) [40 CFR Part 60]~~**

~~E.1.1—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines [326 IAC 12] [40 CFR Part 60, Subpart IIII]~~

~~As specified under 40 CFR 1068.30 as referenced in 40 CFR 60.4219 [40 CFR 60, Subpart IIII]~~

~~the following requirements apply to the portable engines:~~

~~The engines will not remain at a location for more than 12 consecutive months or a shorter period of time for an engine located at a seasonal source. A location is any single site at a building, structure, facility, or installation. Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in calculating the consecutive time period. An engine located at a seasonal source is an engine that remains at a seasonal source during the full annual operating period of the seasonal source. A seasonal source is a stationary source that remains in a single location on a permanent basis (i.e., at least two years) and that operates at that single location approximately three months (or more) each year.~~

**~~SECTION E.2 National Emissions Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [40 CFR Part 63, Subpart ZZZZ] [326 IAC 20-82]~~**

**~~Emissions Unit Description: Insignificant Activities:~~**

~~Two (2) portable diesel-fired emergency generators, constructed in 2001, rated at 10 hp each.~~

~~Under 40 CFR 63, Subpart ZZZZ, these non-stationary generators are exempt.~~

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

~~E.2.1 National Emissions Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [40 CFR Part 63, Subpart ZZZZ] [326 IAC 20-82]~~

~~As specified under 40 CFR 1068.30 as referenced in 40 CFR 63.6675 [40 CFR 63, Subpart ZZZZ] the following requirements apply to the engines:~~

~~The engines will not remain at a location for more than 12 consecutive months or a shorter period of time for an engine located at a seasonal source. A location is any single site at a building, structure, facility, or installation. Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in calculating the consecutive time period. An engine located at a seasonal source is an engine that remains at a seasonal source during the full annual operating period of the seasonal source. A seasonal source is a stationary source that remains in a single location on a permanent basis (i.e., at least two years) and that operates at that single location approximately three months (or more) each year.~~

...

**Change 5:** 326 IAC 2-8-12 states that the Permittee must notify IDEM within "four (4) daytime business hours" for emergencies. The FESOP Emergency Occurrence Report Form lacked the word 'daytime'. 'Daytime' is being added to be consistent with the rule. In addition, the existing rule cite is being corrected to refer to the FESOP rules.

- 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 **2-8-12. 2-7-16**

### Conclusion and Recommendation

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 28, 2016.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 085-37003-00132. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Monica Dick at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-1243 or toll free at 1-800-451-6027 extension 4-1243.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations  
Summary**

**Company Name: Poly-Wood, Inc.**  
**Address City IN Zip: 1001 W. Brooklyn Street, Syracuse, IN 46567**  
**Permit Number: 085-37003-00132**  
**Reviewer: Monica Dick**

<b>Unrestricted Potential to Emit (tons per year)</b>									
<b>Emission Unit</b>	<b>PM</b>	<b>PM-10</b>	<b>PM2.5</b>	<b>SO2</b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>Total HAPs</b>	<b>Single HAP (Hexane)</b>
Plastic product manufacturing line, EU001:									
Plastic Extrusion	0.51	0.51	0.51	-	24.64	0.36	24.64	0.36	0.36
Saws	6.37	3.37	1.88	-	-	-	-	-	-
Plastic Machining	300.81	159.13	70.90	-	-	-	-	-	-
Moulder	14.66	7.75	4.32	-	-	-	-	-	-
Aluminum frame construction operation, EU002:									
Framing (Sanding)	191.11	101.10	56.38	-	-	-	-	-	-
Powder Coating EU003	78.84	78.84	78.84	-	-	-	-	-	-
Plastic Painting EU004	41.13	41.13	41.13	-	-	31.64	-	-	-
Insignificant Activities:									
Combustion	0.18	0.70	0.70	0.06	9.26	0.51	7.77	0.17	0.17
Design center	3.07	1.63	0.91	-	-	-	-	-	-
Hand held tools including routing tables	0.74	0.39	0.22	-	-	-	-	-	-
Welding	0.09	0.01	0.01	-	-	-	-	-	-
<b>Total</b>	<b>637.51</b>	<b>394.56</b>	<b>255.80</b>	<b>0.06</b>	<b>33.89</b>	<b>32.51</b>	<b>32.41</b>	<b>0.54</b>	<b>0.53</b>

The mixer and raw plastics units, which are part of the plastic product manufacturing line EU001 are used to inject material into the extruder, which is not respirable. The material is approximately three millimeters (3mm) in size. The units are not a source of air pollution.

<b>Limited Potential to Emit (tons per year)</b>									
<b>Emission Unit</b>	<b>PM</b>	<b>PM-10</b>	<b>PM2.5</b>	<b>SO2</b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>Total HAPs</b>	<b>Single HAP (Hexane)</b>
Plastic product manufacturing line EU001:									
Plastic Extrusion	0.51	0.51	0.51	-	24.64	0.36	24.64	0.36	0.36
Saws	6.37	3.37	1.88	-	-	-	-	-	-
Plastic Machining	17.52	17.52	17.52	-	-	-	-	-	-
Moulder	14.66	7.75	4.32	-	-	-	-	-	-
Aluminum frame construction operation, EU002:									
Framing (Sanding)	7.88	7.88	7.88	-	-	-	-	-	-
Powder Coating EU003	78.84	12.26	12.26	-	-	-	-	-	-
Plastic Painting EU004	41.13	41.13	41.13	-	-	24.99	-	-	-
Insignificant Activities:									
Combustion	0.18	0.70	0.70	0.06	9.26	0.51	7.77	0.17	0.17
Design center	3.07	1.63	0.91	-	-	-	-	-	-
Hand held tools including routing tables	0.74	0.39	0.22	-	-	-	-	-	-
Welding	0.09	0.01	0.01	-	-	-	-	-	-
<b>Total</b>	<b>171.00</b>	<b>93.16</b>	<b>87.35</b>	<b>0.06</b>	<b>33.89</b>	<b>25.86</b>	<b>32.41</b>	<b>0.54</b>	<b>0.53</b>

**Appendix A: Emissions Calculations  
Summary**

**Significant Permit Revision**

**Company Name: Poly-Wood, Inc.**  
**Address City IN Zip: 1001 W. Brooklyn Street, Syracuse, IN 46567**  
**Permit Number: 085-37003-00132**  
**Reviewer: Monica Dick**

<b>Emission Increase Associated with the SPR (tons per year)</b>									
<b>Emission Unit</b>	<b>PM</b>	<b>PM-10</b>	<b>PM2.5</b>	<b>SO2</b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>Total HAPs</b>	<b>Single HAP (Hexane)</b>
Plastic product manufacturing line, EU001									
Plastic Extrusion	0.23	0.23	0.23	-	10.95	0.16	10.95	0.16	0.16
Saws	6.37	3.37	1.88	-	-	-	-	-	-
Plastic Machining	45.82	45.82	45.82	-	-	-	-	-	-
Moulder	14.66	7.75	4.32	-	-	-	-	-	-
Aluminum frame construction operation, EU002:									
Framing (Sanding)	84.94	84.94	84.94	-	-	-	-	-	-
Powder Coating EU003	35.04	35.04	35.04	-	-	-	-	-	-
Insignificant Activities:									
Combustion	0.05	0.18	0.18	0.01	2.41	0.13	2.02	0.05	0.04
Design center	3.07	1.63	0.91	-	-	-	-	-	-
Hand held tools including routing tables	0.74	0.39	0.22	-	-	-	-	-	-
Welding	0.07	0.07	0.07	-	-	-	-	-	-
<b>Total</b>	<b>190.98</b>	<b>179.41</b>	<b>173.60</b>	<b>0.01</b>	<b>13.36</b>	<b>0.30</b>	<b>12.97</b>	<b>0.21</b>	<b>0.21</b>

## Appendix A: Emissions Calculations

## Plastic Extrusion

Company Name: Poly-Wood, Inc.  
 Address City IN Zip: 1001 W. Brooklyn Street, Syracuse, IN 46567  
 Permit Number: 085-37003-00132  
 Reviewer: Monica Dick

Before Revision						
Process	Maximum Capacity (lb/hr)	Maximum Capacity (tons per hr)	PM Emission Factor (lb/ton)	PM Potential to Emit (tons per year)	VOC Emission Factor (lb/ton)	VOC Potential to Emit (tons per year)
Plastic Extrusion	1287.5	0.64	0.0985	0.28	0.07	0.20

Process	Usage Rate	Emission Factor		Potential to Emit	
	(lb/hr)	NOx (%)	CO (%)	NOx (tons/yr)	CO (tons/yr)
Blowing Agent	12.5	25	25	13.7	13.7

After Revision						
Process	Maximum Capacity (lb/hr)	Maximum Capacity (tons per hr)	PM Emission Factor (lb/ton)	PM Potential to Emit (tons per year)	VOC Emission Factor (lb/ton)	VOC Potential to Emit (tons per year)
Plastic Extrusion	2346	1.17	0.0985	0.51	0.07	0.36

Process	Usage Rate	Emission Factor		Potential to Emit	
	(lb/hr)	NOx (%)	CO (%)	NOx (tons/yr)	CO (tons/yr)
Blowing Agent	22.5	25	25	24.6	24.6

**Methodology**

Plastic Extrusion emission factors based on "Plastic Production and Products Manufacturing", Michigan DEQ

Plastic Extrusion Potential to Emit (tons/yr) = Maximum Capacity (tons/hr) \* EF (lb/ton) \* conversion (8760 hr/yr) \* conversion (ton/2000 lb)

Blowing Agent Potential to Emit (tons/yr) = Usage Rate (lb/hr) \* EF (%) \* conversion (8760 hr/yr) \* conversion (ton/2000 lb)

Appendix A: Emissions Calculations

Plastic Machining - PM Emissions

Company Name: Poly-Wood, Inc.  
 Address City IN Zip: 1001 W. Brooklyn Street, Syracuse, IN 46567  
 Permit Number: 085-37003-00132  
 Reviewer: Monica Dick

Before Revision													
Emission Units	Total Dust Collected (lb/hr)	Particle size collected*			Control Efficiency (%)	Uncontrolled			Controlled				
		PM (lb/hr)	PM10 (lb/hr)	PM2.5 (lb/hr)		PM (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)	Particle sizing wt%*			PM (tons/yr)	PM10 (tons/yr)
Machining (Plastic Parts)	614.8	52.26	27.64	15.42	95%	240.33	127.14	70.90	32.1%	14.3%	12.02	2.04	0.51

After Revision															
Emission Units	Total Dust Collected (lb/hr)	Particle size collected*			Control Efficiency (%)	Uncontrolled			Controlled				Limited FESOP and 326 IAC 2-2		
		PM (lb/hr)	PM10 (lb/hr)	PM2.5 (lb/hr)		PM (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)	Particle sizing wt. (%)*			PM/PM10/PM2.5 (lb/hr)	PM/PM10/PM2.5 (tons/yr)		
Machining (Plastic Parts)	732	62.22	32.91	18.35	95%	286.15	151.37	84.41	32%	14%	14.31	2.43	0.60	4.0	17.52
Moulder	37.5	3.188	1.69	0.94	95%	14.66	7.75	4.32			0.73	0.12	0.03	NA	NA
Saws	17.1	1.454	0.77	0.43	NA	6.37	3.37	1.88			6.37	1.08	0.27	NA	NA
Design center	7.86	0.668	0.35	0.20	95%	3.07	1.63	0.91			0.15	0.03	0.01	NA	NA
Hand held tools including routing tables	1	0.085	0.04	0.03	0%	0.74	0.39	0.22			0.74	0.13	0.03	NA	NA
<b>Total:</b>	-	-	-	-	-	<b>300.81</b>	<b>159.13</b>	<b>88.74</b>			<b>15.04</b>	<b>2.55</b>	<b>0.63</b>		

The design center is not part of a manufacturing process line. Prototype furniture is made as needed in the design center and only used for demonstration. The worst case annual emissions are listed above. The worst case lb/hr collected is 31.45.

\*Particle sizing of the Total PM collected by weight % = 8.5% TPM based on site specific analysis. Particle sizing factors are located in AP-42 page B.1-48, Woodworking waste collection operators: belt sander hood exhaust to cyclone = Particle sizing of cyclone weight % = 52.9% is PM10 and 29.5% is PM2.5. Controlled wt % after cyclone and fabric filter is 32.1 % PM10 and 14.3 % PM2.5. As a worst case, PM, PM10, and PM2.5 emissions are based on the calculated amount collected plus the calculated amount emitted.

Methodology

Particle size collected (lb/hr) = Total dust collected (lb/hr) \* particle sizing of the catch (wt %)

Uncontrolled (tons/yr) = amount collected + amount emitted =

Particle size collected (lb/hr) \* (1 - Dust Collector Control Efficiency (%)) + particle size collected (lb/hr) \* particle sizing of the catch (wt %) \* conversion (8760 hrs/yr) \* conversion (ton/2000lbs)

Controlled (tons/yr) = Uncontrolled (tons/yr) \* (1 - Dust Collector Control Efficiency (%))

Limited (ton/year) = limited (lb/hr) \* conversion (8760hr/yr) \* conversion (ton/2000lbs)

**Appendix A: Emissions Calculations  
Potential to Emit**

**Aluminum Frame Sanding**

**Company Name:** Poly-Wood, Inc.  
**Address City IN Zip:** 1001 W. Brooklyn Street, Syracuse, IN 46567  
**Permit Number:** 085-37003-00132  
**Reviewer:** Monica Dick

Note: The only process in the aluminum frame construction operation that emits air pollutants is the sanding operation.

Before Revision														
Emissions Unit	Dust Collected (lb/hr)	Particle sizing catch wt. (%)			Uncontrolled			Control efficiency (%)	Controlled					
		PM	PM10	PM2.5	PM (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)		Particle sizing emissions wt. (%)			PM (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)
									PM	PM10	PM2.5			
Sanding Operation	24		52.9%	29.5%	106.17	56.16	31.32	99%		32.1%	14.3%	1.06	0.18	0.04

Particle sizing factors are located in AP-42 page B.1-48, Woodworking waste collection operations: belt sander hood exhaust to cyclone.

After Revision																
Emissions Unit	Dust Collected (lb/hr)	Particle sizing catch wt. (%)			Uncontrolled			Control efficiency (%)	Controlled					Limited		
		PM	PM10	PM2.5	PM (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)		Particle sizing emissions wt. (%)			PM (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)	FESOP and 326 IAC 2-2 PM/PM10/PM2.5	
									PM	PM10	PM2.5				(lb/hr)	(ton/year)
Sanding Operation	43.2		52.9%	29.5%	191.11	101.10	56.38	99%		32.1%	14.3%	1.91	0.32	0.08	1.80	7.88

**Methodology**

Uncontrolled (tons/yr) = amount collected + amount emitted =

Dust Collected (lb/hr) \* (1 - Control Efficiency(%)) + Dust Collected (lb/hr) \* conversion (8760 hrs/yr) \* conversion (ton/2000lbs)

Controlled (tons/yr) = Uncontrolled (tons/yr) \* (1 - Control Efficiency (%))

Limited (ton/year) = 1.5 lbs/hour \* conversion (8760hour/yr) \* conversion (ton/2000lbs)

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

**Company Name: Poly-Wood, Inc.  
Address City IN Zip: 1001 W. Brooklyn Street, Syracuse, IN 46567  
Permit Number: 085-37003-00132  
Reviewer: Monica Dick**

Before Revision							
PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)		EMISSIONS (lbs/hr)		HAPS (lbs/hr)
			PM = PM10	Mn	PM = PM10	Mn	
WELDING							
Metal Inert Gas (MIG)(carbon steel)	1	1	0.0055	0.0005	0.006	0.001	0.001
<b>EMISSION TOTALS</b>							
Potential Emissions lbs/hr					0.01	0.00	0.00
Potential Emissions lbs/day					0.13	0.01	0.01
Potential Emissions tons/year					0.02	0.00	0.00

After Revision							
PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)		EMISSIONS (lbs/hr)		HAPS (lbs/hr)
			PM = PM10	Mn	PM = PM10	Mn	
WELDING							
Metal Inert Gas (MIG)(carbon steel)	7	0.25	0.0055	0.0005	0.010	0.001	0.001
Tungsten Inert Gas (TIG)(carbon steel)	5	0.41	0.0055	0.0005	0.011	0.001	0.001
<b>EMISSION TOTALS</b>							
Potential Emissions lbs/hr					0.02	0.00	0.00
Potential Emissions lbs/day					0.50	0.05	0.05
Potential Emissions tons/year					0.09	0.01	0.01

**Methodology:**

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

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

Using AWS average values:  $(0.25 \text{ g/min}) / (3.6 \text{ m/min}) \times (0.0022 \text{ lb/g}) / (39.37 \text{ in./m}) \times (1,000 \text{ in.}) = 0$   
 Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant)  
 Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant)  
 Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant)  
 Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day  
 Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs

**Appendix A: Emissions Calculations  
Potential to Emit**

**Powder Coating Operations**

**Company Name: Poly-Wood, Inc.**  
**Address City IN Zip: 1001 W. Brooklyn Street, Syracuse, IN 46567**  
**Permit Number: 085-37003-00132**  
**Reviewer: Monica Dick**

Before Revision									
Emission Unit	Usage (lb/hr)	Transfer Efficiently (%)	Uncontrolled	Control Efficiency (%)	Controlled				
			PM (tons/yr)		Particle sizing		PM (ton/yr)	PM10 (ton/yr)	PM2.5 (ton/yr)
					PM10 wt. (%)	PM2.5 wt. (%)			
Powder Coating	20	50%	43.80	99%	54%	39%	0.44	0.24	0.17

Particle sizing factors are located in AP-42 page B.1-60, Lightweight aggregate (clay): reciprocation grate clinker cooler.

After Revision											
Emission Unit	Usage (lb/hr)	Transfer Efficiency (%)	Uncontrolled PM (tons/yr)	Control Efficiency (%)	Controlled					FESOP and 326 IAC 2-2 Limit	
					Particle sizing		PM (ton/yr)	PM10 (ton/yr)	PM2.5 (ton/yr)	PM10/PM2.5	
					PM10 wt. (%)	PM2.5 wt. (%)				(lb/hr)	(ton/yr)
Powder Coating	36	50%	78.84	99%	54%	39%	0.79	0.43	0.31	2.80	12.26

**Methodology**

Uncontrolled (tons/yr) = Usage (lb/hr) \* (1 - Transfer Eff. (%)) \* conversion (8760 hrs/yr) \* conversion (ton/2000lbs)

PM Controlled (ton/yr) = Uncontrolled (tons/year) \* (1 - Control Eff. (%))

PM10/PM2.5 Controlled (ton/yr) = PM Controlled (ton/yr) \* Particle size (%)

Limited (ton/year) = limit (lbs/hour) \* conversion (8760hour/yr) \* conversion (ton/2000lbs)

**Appendix A: Emissions Calculations  
VOC and Particulate  
Plastic Painting Operations**

**Company Name: Poly-Wood, Inc.  
Address City IN Zip: 1001 W. Brooklyn Street, Syracuse, IN 46567  
Permit Number: 085-37003-00132  
Reviewer: Monica Dick**

Material	Density (Lb/Gal)	Weight % Organics	Weight % Non-Volatiles (solids) <sup>1</sup>	Gal of Mat. (gal/hr)	VOC Content (lbs/gal)	Potential				Transfer Efficiency (%)	Control Efficiency (%)	Controlled					Limited		
						VOC (lbs/hr)	VOC (lbs/day)	VOC (ton/yr)	PM (ton/yr)			Particle sizing <sup>2</sup>		PM (ton/yr)	PM10 (ton/yr)	PM2.5 (ton/yr)	PM/PM10/PM2.5		VOC
												PM10 (%)	PM2.5 (%)				(lbs/hr)	(ton/yr)	
Silky Gloss W/R Clear Coating	8.4	10%	52%	8.60	0.84	7.22	173.38	31.64	41.13	75%	95%	47%	29%	2.06	0.96	0.59	1.00	4.38	24.99

Silky Gloss W/R Clear Coating is contains no HAPs.

<sup>1</sup> The Tangerine coating with 50 - 52% of solid content is highest of all color coatings used in this process

<sup>2</sup> Particle sizing factors are located in AP-42 page B.1-12, Automobile and light-duty truck surface coating operations: automobile spray booths (water-base enamel).

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

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

**Before Revision**

**Company Name:** Poly-Wood, Inc.  
**Address City IN Zip:** 1001 W. Brooklyn Street, Syracuse, IN 46567  
**Permit Number:** 085-37003-00132  
**Reviewer:** Monica Dick

Heat Input Capacity MMBtu/hr	HHV MMBtu MMscf	Potential Throughput MMCF/yr
15.9	1020	136.9

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx **see below	VOC	CO
Potential Emission in tons/yr	0.1	0.5	0.5	0.0	6.8	0.4	5.7

\*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 recirculat

**Methodology**

All emission factors are based on normal firing  
 MMBtu = 1,000,000 Btu  
 MMCF = 1,000,000 Cubic Feet  
 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  
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000

**HAPS Calculations**

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	Total Organics
Potential Emission in tons/yr	0.00	0.00	0.01	0.12	0.00	<b>0.13</b>

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	Total Metals
Potential Emission in tons/yr	0.00	0.00	0.00	0.00	0.00	<b>0.00</b>

<b>Total HAPs</b>	<b>0.13</b>
<b>Worst HAP</b>	<b>0.12</b>

Methodology is the same as above

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

Natural Gas Combustion Only  
After Revision

Company Name: Poly-Wood, Inc.  
Address City IN Zip: 1001 W. Brooklyn Street, Syracuse, IN 46567  
Permit Number: 085-37003-00132  
Reviewer: Monica Dick

Asset #	Location	Use Type	Category	Input (Btu/hr)
<b>Building 1</b>				
8101	Building 1/Office/Conf Rm	Office	Furnace	75,000
8107	Building 1/Office/IT	Office	Furnace	66,000
	Building 1 Design Center	Furniture Production	Hanging heater	145,000
	Building 1 Design Center	Furniture Production	Furnace	400,000
	Building 1 Show Room	Furniture Production	Ceiling Radiant	125,000
	Building 1/Extrusion area	Lumber Production	Ceiling Radiant	125,000
	Building 1/Extrusion area	Lumber Production	Ceiling Radiant	125,000
	Building 1/Extrusion area	Lumber Production	Ceiling Radiant	125,000
	Building 1/Extrusion area	Lumber Production	Ceiling Radiant	125,000
	Area 51-North	Lumber Production	Ceiling Radiant	100,000
	Area 51-South	Lumber Production	Ceiling Radiant	100,000
N/A, 5a	Building 1/Sewing	Sewing	Ceiling Radiant	120,000
N/A, 5b	Building 1/Sewing	Sewing	Ceiling Radiant	120,000
N/A, 5a	Building 1/Sewing	Sewing	Ceiling Radiant	120,000
8503	Building East/Office	Office	Outside unit	180,000
8506	Building East/Office	Office	Furnace- North	66,000
8507	Building East/Office	Office	Furnace- middle	60,000
8508	Building East/Office	Office	Furnace- South	66,000
<b>Total</b>				<b>2,368,000</b>
<b>Building 2</b>				
	Building 2/Hardware	Furniture Production	Ceiling Radiant	120,000
	Building 2/Breakroom	Furniture Production	Ceiling Radiant	120,000
	Building 2/Cell 2 (in drive area)	Furniture Production	Ceiling Radiant	100,000
	Building 2/Cell 2 (over CNC)	Furniture Production	Ceiling Radiant	120,000
	Building 2 (compressor area)	Furniture Production	Ceiling Radiant	120,000
	Building 2 (box machine)	Furniture Production	Ceiling Radiant	100,000
	Building 2/Cell 8 (in drive area)	Furniture Production	Ceiling Radiant	150,000
	Lumber Storage (north)	Furniture Production	Ceiling Radiant	80,000
	Lumber Storage (area 1)	Furniture Production	Ceiling Radiant	80,000
	Lumber Storage (area 2)	Furniture Production	Ceiling Radiant	80,000
	Lumber Storage (area 3)	Furniture Production	Ceiling Radiant	80,000
	Lumber Storage (area 4)	Furniture Production	Ceiling Radiant	80,000
8503	Building 2 (office)	Furniture Production	Furnace	110,000
<b>Total</b>				<b>1,340,000</b>
<b>Building 3</b>				
	Building 3 (west wing)	Shipping/Storage	Ceiling Radiant	100,000
	Building 3 (west wing)	Shipping/Storage	Ceiling Radiant	100,000
	Building 3 (west wing)	Shipping/Storage	Ceiling Radiant	100,000
	Building 3 (west wing)	Shipping/Storage	Ceiling Radiant	100,000
3901	Building 3 (SE corner)	Shipping/Storage	Furnace	400,000
3902	Building 3 (NW corner)	Shipping/Storage	Furnace	400,000
	Building 3 (SW corner)	Shipping/Storage	Hanging Heater	250,000
8501	Building 3 (office)	Shipping/Storage	Furnace	80,000
<b>Total</b>				<b>1,530,000</b>
<b>Building 4</b>				
	Fab area	Powder coating/Fab	U-Ceiling Radiant	200,000
	Fab area	Powder coating/Fab	U-Ceiling Radiant	200,000
	Fab area	Powder coating/Fab	U-Ceiling Radiant	200,000
	Fab area	Powder coating/Fab	U-Ceiling Radiant	200,000
	Fab area	Powder coating/Fab	U-Ceiling Radiant	200,000
	Fab area	Powder coating/Fab	Ceiling Radiant	150,000
	Washdown	Powder coating/Fab	Ceiling Radiant	80,000
	Dry-off Oven	Powder coating/Fab	Ceiling Radiant	80,000
	Primer Booth	Powder coating/Fab	Ceiling Radiant	80,000
	Final Cure	Powder coating/Fab	Ceiling Radiant	80,000
	Powder Coat (rear)	Powder coating/Fab	Ceiling Radiant	80,000
4201	Washer	Powder coating/Fab	Water Heater	1,500,000
4202	Dry-off Oven	Powder coating/Fab	Heating	800,000
4200	Finish Cure Oven	Powder coating/Fab	Heating	1,500,000
<b>Total</b>				<b>5,350,000</b>
<b>Building 5</b>				
	Plant	Furniture Production	Furnace	830,000
	Plant	Furniture Production	Furnace	830,000
	Plant	Furniture Production	Furnace	830,000
	Plant	Furniture Production	Furnace	830,000
	Plant	Furniture Production	Furnace	830,000
	Plant	Air Compressor Room	Hanging Heater	100,000
	Plant	Air Compressor Room	Hanging Heater	100,000
	Plant	Furniture Production	Conveyor Oven	746,666
	Plant	Furniture Production	Conveyor Oven	746,666
	Plant	Furniture Production	Conveyor Oven	746,666
<b>Total</b>				<b>6,589,998</b>
<b>Building 6</b>				
2913	West side (Area 9)	Furniture Production	Ceiling Radiant	200,000
	West side (Onsrud 1 north)	Furniture Production	Ceiling Radiant	110,000
	West side (Onsrud 2 south)	Furniture Production	Ceiling Radiant	200,000
2914	West side	Furniture Production	Hanging Heater	150,000
2916		Furniture Production	Hanging Heater	150,000
2918		Furniture Production	Hanging Heater	250,000
2919		Furniture Production	Hanging Heater	125,000
2920		Furniture Production	Hanging Heater	250,000
2921		Furniture Production	Hanging Heater	175,000
2922		Furniture Production	Hanging Heater	250,000
2923		Furniture Production	Hanging Heater	125,000
2924		Furniture Production	Hanging Heater	150,000
	East side (outside office door south)	Furniture Production	Ceiling Radiant	200,000
2926		Furniture Production	Hanging Heater	250,000
8124	Upstairs east office	Furniture Production	Furnace	150,000
8125	Upstairs west office	Furniture Production	Furnace	140,000
	Paint Booth	Furniture Production	Supply Air Unit	1,500,000
<b>Total</b>				<b>4,375,000</b>

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

MMBtu	
2.37	Bldg. 1
1.34	Bldg. 2
1.53	Bldg. 3
5.35	Bldg. 4
6.59	Bldg. 5
4.38	Bldg. 6
21.55	<b>Total</b>

**After Revision**

**Company Name: Poly-Wood, Inc.  
Address City IN Zip: 1001 W. Brooklyn Street, Syracuse, IN 46567  
Permit Number: 085-37003-00132  
Reviewer: Monica Dick**

Heat Input Capacity MMBtu/hr	HHV MMBtu MMscf	Potential Throughput MMCF/yr
21.55	1020	185.1

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	0.2	0.7	0.7	0.1	9.3	0.5	7.8

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

**Methodology**

All emission factors are based on normal firir  
MMBtu = 1,000,000 Btu  
MMCF = 1,000,000 Cubic Feet  
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, 1-03-006-0.  
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,0.  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,00

**HAPS Calculations**

HAPS - Organics						
Emission Factor in lb/MMcf	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total Organics
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	0.00	0.00	0.01	0.17	0.00	<b>0.17</b>

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

<b>Total HAPs</b>	<b>0.17</b>
<b>Worst HAP</b>	<b>0.17</b>

Methodology is the same as abo

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

**Appendix A: Emissions Calculations**  
**326 IAC 6-3-2**

**Company Name:** Poly-Wood, Inc.  
**Address City IN Zip:** 1001 W. Brooklyn Street, Syracuse, IN 46567  
**Permit Number:** 085-37003-00132  
**Reviewer:** Monica Dick

<b>Emission Unit</b>	<b>Process Weight Rate (lb/hr)</b>	<b>Process Weight Rate (tons/hr)</b>	<b>Emissions Uncontrolled (lb/hr)</b>	<b>326 IAC 6-3-2 applicable (Y/N)</b>	<b>326 IAC 6-3-2 Limit (lb/hr)<sup>1</sup></b>	<b>Emissions Controlled (lb/hr)</b>
Plastics Extrusion	2346	1.17	0.12	N	NA	NA
Plastics Machining	2250	1.13	65.33	Y	4.44	3.27
Plastics Moulder	300	0.15	3.35	Y	1.15	0.17
Plastics Sawing	2346	1.17	1.45	Y	4.56	NA
Design Center	333.9	0.17	0.70	Y	1.24	0.04
Framing (Sanding)	607	0.30	43.20	Y	1.84	0.44
Welding	540	0.27	0.021	N	NA	NA
Powder Coating	643	0.32	18.00	Y	1.92	0.18

Pursuant to 326 IAC 6-3-1(b)(14), the plastic mixer, raw plastic storage, and plastic hand tools including routers are exempt from 326 IAC 6-3, because each emission unit has emits less than 0.551 pounds per hour.

Pursuant to 326 IAC 6-3-1(b)(13), plastic hand tools including routers are exempt from 326 IAC 6-3, because they meet the definition of trivial activities at 326 IAC 2-7-1(42)(H).

The 326 IAC 6-3-2 pounds per hour limitation was calculated with the following equation:

$$^1 E=4.10 * (P) ^{0.67} \text{ where } E = \text{emission limit (lb/hr), } P = \text{process wt. rate tons/hr}$$



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

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

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

May 26, 2016

Mr. Doug Rassi  
Poly-Wood, LLC  
1001 West Brooklyn Street  
Syracuse, IN 46567

Re: Public Notice  
Poly-Wood, LLC  
Permit Level: Federally Enforceable State  
Operating Permit (FESOP)  
Significant Permit Revision  
Permit Number: 085-37003-00132

Dear Mr. Rassi:

Enclosed is a copy of your draft Federally Enforceable State Operating Permit (FESOP) Significant Permit Revision, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Times-Union in Warsaw, Indiana publish the abbreviated version of the public notice no later than May 31, 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 Syracuse Public Library, 115 East Main Street in Syracuse, 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 Monica Dick, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-1243 or dial (317) 234-1243.

Sincerely,

*Vivian Haun*

Vivian Haun  
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

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

May 25, 2016

Times Union  
PO Box 1448  
Warsaw, IN 46581-1448

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Poly-Wood, LLC, Kosciusko 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 May 31, 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 Vivian Haun at 800-451-6027 and ask for extension 3-6878 or dial 317-233-6878.

Sincerely,

*Vivian Haun*

Vivian Haun  
Permit Branch  
Office of Air Quality

Permit Level: Federally Enforceable State Operating Permit (FESOP)  
Significant Permit Revision

Permit Number: 085-37003-00132

Enclosure  
PN Newspaper.dot 8/27/2015



# Indiana Department of Environmental Management

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

May 26, 2016

To: Syracuse 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: Poly-Wood, LLC**  
**Permit Number: 085-37003-00132**

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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100 N. Senate Avenue • Indianapolis, IN 46204

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

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## Notice of Public Comment

**May 26, 2016**  
**Poly-Wood, LLC**  
**085-37003-00132**

Dear Concerned Citizen(s):

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

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

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

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

Enclosure  
PN AAA Cover.dot 2/17/2016

# Mail Code 61-53

IDEM Staff	VHAUN 5/26/2016 Poly-Wood LLC 085-37003-00132 DRAFT		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Doug Rassi Poly-Wood LLC 1001 W Brooklyn St Syracuse IN 46567 (Source CAATS)										
2		Wade Burkholder Senior Building Manager/Project Manager Poly-Wood LLC 1001 W Brooklyn St Syracuse IN 46567 (RO CAATS)										
3		Kosciusko County Board of Commissioners 100 W. Center St, Room 220 Warsaw IN 46580 (Local Official)										
4		Syracuse Public Library 115 East Main Street Syracuse IN 46567 (Library)										
5		Kosciusko County Health Department 100 W. Center Street, 3rd Floor Warsaw IN 46580-2877 (Health Department)										
6		Scott R Parker Ergo Resource Management, Inc. 801 N. Huntington Street, Suite # 7 Syracuse IN 46567 (Consultant)										
7		Stanley H & Catherine L Hoopingarner 4180 E 1300 N Syracuse IN 46567 (Affected Party)										
8		Avon Bushong PO Box 323 Syracuse IN 46567 (Affected Party)										
9		David Stouder PO Box 31 Leesburg IN 46538 (Affected Party)										
10		Doris A Stahly Trust 4424 E 1300 N Syracuse IN 46567 (Affected Party)										
11		Larry D & Carolyn Weaver 4452 E 1300 N Syracuse IN 46567 (Affected Party)										
12		Scot A & Angela K Robbins 4444 E 1300 N Syracuse IN 46567 (Affected Party)										
13		Tamara Delaughter 710 W Brooklyn Street Syracuse IN 46567 (Affected Party)										
14		Daniel Graff 705 W Brooklyn Street Syracuse IN 46567 (Affected Party)										
15		Johnny A Eppert 103 N Oak Street Syracuse IN 46567 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
<b>15</b>			

# Mail Code 61-53

IDEM Staff	VHAUN 5/26/2016 Poly-Wood LLC 085-37003-00132 DRAFT			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling 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		Garry Hamilton 201 N Oak Street Syracuse IN 46567 (Affected Party)									
2		Randall Lee Larimer 203 N Oak Street Syracuse IN 46567 (Affected Party)									
3		Vance Lopp 6668 E Waco Drive Syracuse IN 46564 (Affected Party)									
4											
5											
6											
7											
8											
9											
10											
11											
12											
13											
14											
15											

Total number of pieces Listed by Sender  <div style="font-size: 2em; font-weight: bold; text-align: center;">3</div>	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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