



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

To: Interested Parties

Date: May 11, 2016

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

Source Name: Gator Cases, Inc.

Permit Level: MSOP – Administrative Amendment

Permit Number: 183-37074-00049

Source Location: 2499 South 600 East
Columbia City, Indiana 46725

Type of Action Taken: Changes that are administrative in nature

Notice of Decision: Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 37074.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

(continues on next page)

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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Michael R. Pence
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Mr. Michael Barnhill
Gator Cases Inc.
2499 South 600 East
Columbia City, Indiana 46725

May 11, 2016

Re: M183-37074-00049
Administrative Amendment to
M183-35843-00049

Dear Mr. Barnhill:

Gator Cases Inc. was issued a Minor Source Operating Permit (MSOP) No. M183-37074-00049 on September 10, 2015 for a stationary plastic molding plant located at 2499 South 600 East, Columbia City, Indiana 46725. On April 14, 2016, the Office of Air Quality (OAQ) received an application from the source requesting to add one (1) adhesive operation and one (1) natural combustion unit.

Pursuant to 326 IAC 2-6.1-6(d) the permit is hereby administratively amended as described in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire MSOP as amended.

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 Ms. Renee Traivaranon of my staff at 317-234-5615 or 1-800-451-6027, and ask for extension 4-5615.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit and Appendix A
IC/rt

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



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

New Source Construction and Minor Source Operating Permit OFFICE OF AIR QUALITY

**Gator Cases Inc.
2499 South 600 East
Columbia City, Indiana 46725**

(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.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.

Operation Permit No.: M183-35843-00049	
Issued by: <i>Original Signed by</i> Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 10, 2015 Expiration Date: September 10, 2020

Administrative Amendment No.: M183-37074-00049	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 11, 2016 Expiration Date: September 10, 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 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary plastic molding plant.

Source Address:	2499 South 600 East, Columbia City, Indiana 46725
General Source Phone Number:	(260) 213-4616
SIC Code:	3089 (Plastics Products, Not Elsewhere Classified)
County Location:	Whitley
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source 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

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

- (a) Two (2) plastic molding operations, identified as PM1 and PM2, approved in 2015 for construction, each with a maximum capacity of 77.2 pounds per hour, without control and exhausting to stacks SV1 and SV2, respectively.
- (b) One (1) plastic grinding operation, identified as PG, approved in 2015 for construction, with a maximum capacity of 10 pounds per hour, without control and exhausting inside.
- (c) One (1) wood working operation for custom wood cases, identified as WW, approved in 2015 for construction, with a maximum capacity of 35 pounds per hour, with baghouse (BH1) as integral control and exhausting inside.
- (d) One (1) ink stamping operation, identified as IS, approved in 2015 for construction, with a maximum capacity of 1 gallon of ink per hour, without control and exhausting inside.
- (e) Three (3) Welding stations, identified as W1, W2 and W3, approved in 2015 for construction, each with a maximum capacity of 1 pound of electrodes per hour, without control and exhausting inside.
- (f) One (1) flame cutting station, identified as F, approved in 2015 for construction, with a maximum cutting rate of 15 inches of metal per minute, without control and exhausting inside.
- (g) One (1) abrasive blasting operation, identified as AB, approved in 2015 for construction, with a maximum capacity of 560 pounds of abrasive (steel shots) per hour, without control and exhausting to stack SV3.
- (h) One (1) metal coating operation, identified as MC, approved in 2015 for construction, using brush application method, with a maximum capacity of 2 units per hour, without control and exhausting to outside.

- (i) One (1) adhesive application operation, identified as ADH-01, approved in 2016 for construction, using hand application method, with a maximum capacity of 0.40 gallons/hour of adhesive, without control and exhausting to inside.
- (j) Natural gas-fired space heaters, collectively identified as NG, approved in 2015 for construction, without control, exhausting inside and consisting of the following:

Unit	# of Units	Maximum Heat Input Capacity (MMBtu/hr) each
MODINE	2	0.1
ROBERTS GORDON	2	0.2
ROBERTS GORDON	6	0.1
DAYTON	2	0.2
DAYTON	2	0.2
DAYTON	2	0.1
DAYTON	2	0.1
BRYANY	8	0.2
CARRIER AIR	2	0.2
MAGIC CHEF	1	0.2
RENZOR	1	0.2
RENZOR	3	0.2
RENZOR	1	0.2
YORK	1	0.1
ROTOLINE 3.0	1	1.9
ROTOLINE 2.5	1	1.2
ROTOLINE 1.65	1	1.65
Total	38	6.96

- (k) Hand held machining operations.
- (l) Paved roads.
- (m) Cleaners and solvent application for maintenance purpose only with total usage less than 145 gallons per year.
- (n) Brazing, soldering and welding operations associated with maintenance activities.
- (o) Open tumblers for deburring operations in maintenance shop.
- (p) Hot melt adhesive with no VOC emissions.
- (q) Manual loading and unloading operations.
- (r) Machining with aqueous cutting coolant.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

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

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

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

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

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as 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 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M183-35843-00049, 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]

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

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

B.7 Severability

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

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

B.9 Duty to Provide Information

- (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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 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
- (c) The notification 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.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (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.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M183-35843-00049 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.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.14 Permit Renewal [326 IAC 2-6.1-7]

- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete 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 one hundred twenty (120) days 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 2-6.1 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 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.16 Source Modification Requirement

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

B.17 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a permitted 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.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.19 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) 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.20 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

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

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

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

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

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale

such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

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

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

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

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of 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

- (b) 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.

- (c) 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.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) plastic molding operations, identified as PM1 and PM2, approved in 2015 for construction, each with a maximum capacity of 77.2 pounds per hour, without control and exhausting to stacks SV1 and SV2, respectively.
- (b) One (1) plastic grinding operation, identified as PG, approved in 2015 for construction, with a maximum capacity of 10 pounds per hour, without control and exhausting inside.
- (c) One (1) wood working operation for custom wood cases, identified as WW, approved in 2015 for construction, with a maximum capacity of 35 pounds per hour, with baghouse (BH1) as integral control and exhausting inside.
- (d) One (1) ink stamping operation, identified as IS, approved in 2015 for construction, with a maximum capacity of 1 gallon of ink per hour, without control and exhausting inside.
- (e) Three (3) Welding stations, identified as W1, W2 and W3, approved in 2015 for construction, each with a maximum capacity of 1 pound of electrodes per hour, without control and exhausting inside.
- (f) One (1) flame cutting station, identified as F, approved in 2015 for construction, with a maximum cutting rate of 15 inches of metal per minute, without control and exhausting inside.
- (g) One (1) abrasive blasting operation, identified as AB, approved in 2015 for construction, with a maximum capacity of 560 pounds of abrasive (steel shots) per hour, without control and exhausting to stack SV3.
- (h) One (1) metal coating operation, identified as MC, approved in 2015 for construction, using brush application method, with a maximum capacity of 2 units per hour, without control and exhausting to outside.
- (i) One (1) adhesive application operation, identified as ADH-01, approved in 2016 for construction, using hand application method, with a maximum capacity of 0.40 gallons of adhesive, without control and exhausting to inside.
- (j) Natural gas-fired space heaters, collectively identified as NG, approved in 2015 for construction, without control, exhausting inside and consisting of the following:

Unit	# of Units	Maximum Heat Input Capacity (MMBtu/hr) each
MODINE	2	0.1
ROBERTS GORDON	2	0.2
ROBERTS GORDON	6	0.1
DAYTON	2	0.2
DAYTON	2	0.2
DAYTON	2	0.1
DAYTON	2	0.1
BRYANY	8	0.2
CARRIER AIR	2	0.2
MAGIC CHEF	1	0.2
RENZOR	1	0.2
RENZOR	3	0.2
RENZOR	1	0.2

YORK	1	0.1
ROTOLINE 3.0	1	1.9
ROTOLINE2.5	1	1.2
ROTOLINE1.65	1	1.2
Total	38	6.96

(k) Hand held machining operations.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from each of the following process with a maximum process weight rate less than 100 pounds per hour, shall not exceed 0.551 pounds per hour.
 - (i) plastic grinding operation (PG)
 - (ii) wood working operation (WW)
- (b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the abrasive blasting operation (AB) shall not exceed 1.74 pounds per hour when operating at a process weight rate of 0.28 tons per hour (560 pounds per hour). 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:

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

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

D.1.3 Particulate Control

- (a) In order to comply with the particulate limit specified in Condition D.1.1 for the wood working operation (WW), the baghouse (BH1) equipped on the wood working operation (WW) for particulate control shall be in operation and control emissions from the wood working operation (WW) at all times that the wood working operation (WW) is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.4 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the wood working operation (WW). All defective bags shall be replaced.

D.1.5 Broken or Failed Bag Detection

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

- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.6 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.4, the Permittee shall maintain records of the results of the inspections required under Condition D.1.4.

- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Gator Cases Inc.
Address:	2499 South 600 East
City:	Columbia City, Indiana 46725
Phone #:	(260) 213-4616
MSOP #:	M183-35843-00049

I hereby certify that Gator Cases Inc. is:

still in operation.

no longer in operation.

I hereby certify that Gator Cases Inc. is:

in compliance with the requirements of MSOP M183-35843-00049.

not in compliance with the requirements of MSOP M183-35843-00049.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865**

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

Gator Cases Inc.
2499 South 600 East
Columbia City, Indiana 46725

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 Gator Cases Inc. 2499 South 600 East, Columbia City, Indiana 46725, has constructed and will operate a plastic molding plant on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on May 20, 2015 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M183-35843-00049, Plant ID No. 183-00049 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 an Administrative Amendment to a
Minor Source Operating Permit (MSOP)

Source Description and Location
--

Source Name:	Gator Cases Inc.
Source Location:	2499 South 600 East, Columbia City, IN 46725
County:	Whitley
SIC Code:	3089 (Plastics Products, Not Elsewhere Classified)
Operation Permit No.:	M183-35843-00049
Operation Permit Issuance Date:	September 10, 2015
Administrative Amendment No.:	M183-37074-00049
Permit Reviewer:	Renee Traivaranon

On April 14, 2016, the Office of Air Quality (OAQ) received an application from Gator Cases Inc. related to a modification to an existing stationary plastic molding plant.

Existing Approvals

The source was issued MSOP No. M183-35843-00049 on September 10, 2015. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Whitley County.

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

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

- (b) **PM_{2.5}**
Whitley County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5},

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

- (c) **Other Criteria Pollutants**
 Whitley 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 uncontrolled/unlimited potential to emit of the entire source, prior to the amendment:

This PTE table is from the Appendix A of M183-35843-00049, issued on September 10, 2015.

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source Prior to Amendment (tons/year)								
	PM	PM10*	PM2.5**	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
plastic molding operations (PM1 and PM2)	-	-	-	-	-	0.34	-	0.03	0.03
plastic grinding operation (PG)	5.00	5.00	5.00	-	-	-	-	-	-
wood working operation (WW)	1.15***	1.15***	1.15***	-	-	-	-	-	-
ink stamping operation (IS)	-	-	-	-	-	21.46	-	0.42	0.42
welding stations (W1, W2 and W3) and flame cutting station (F)	0.39	0.39	0.39	-	-	-	-	0.04	0.04
abrasive blasting operation (AB)	9.81	8.44	8.44	-	-	-	-	-	-
metal coating operation (MC)	-	-	-	-	-	9.94	-	-	-
natural gas-fired space heaters (NG)	0.07	0.28	0.28	0.02	3.75	0.21	3.15	0.07	0.07
hand held machining operations	5.00	5.00	5.00	-	-	-	-	-	-
paved Roads	0.38	0.08	0.02	-	-	-	-	-	-
cleaners and solvent application	-	-	-	-	-	0.54	-	-	-
manual loading and unloading operations	5.00	5.00	5.00	-	-	-	-	-	-
Total PTE of Entire Source Excluding Fugitives	26.80	25.34	25.28	0.02	3.75	32.49	3.15	0.57	0.57 (Hexane)

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source Prior to Amendment (tons/year)								
	PM	PM10*	PM2.5**	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
MSOP Threshold	25	25	25	25	25	25	-	-	-
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". **PM _{2.5} listed is direct PM _{2.5} . *** The emissions are after integral control (baghouse (BH1)).									

Description of Amendment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Gator Cases Inc. on September 10, 2015, relating to add one (1) adhesive operation and one (1) natural combustion unit.

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

- (a) One (1) adhesive application operation, identified as ADH-01, approved in 2016 for construction, using hand application method, with a maximum capacity of 0.40 gallons of adhesive per hour, without control and exhausting to inside.
- (b) One (1) Natural gas-fired space heater, identified as ROTOLINE 1.65, approved in 2016 for construction, without control, exhausting inside.

Enforcement Issues

There are no pending enforcement actions related to this amendment.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP Amendment

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the amendment. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of Amendment (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Adhesive application operation (ADH-01)	0	0	0	0	0	7.81	0	0	0
Natural gas unit (ROTOLINE 1.65)	0.01	0.05	0.05	0.004	0.71	0.04	0.60	0.01	negl
Total PTE of Amendment	0.01	0.05	0.05	0.004	0.71	7.85	0.60	0.01	negl.
negl. = negligible									

Pursuant to 326 IAC 2-6.1-6(d)(11), this change to the permit is considered an administrative amendment because the permit is amended to add an emissions, subject to 326 IAC 2-1.1-3 (Exemptions), at the request of the applicant.

PTE of the Entire Source After Issuance of the MSOP Amendment

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strike through~~ values.

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source After Amendment (tons/year)								
	PM	PM10*	PM2.5**	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
plastic molding operations (PM1 and PM2)	-	-	-	-	-	0.34	-	0.03	0.03
plastic grinding operation (PG)	5.00	5.00	5.00	-	-	-	-	-	-
wood working operation (WW)	1.15 ***	1.15 ***	1.15 ***	-	-	-	-	-	-
ink stamping operation (IS)	-	-	-	-	-	21.46	-	0.42	0.42
welding stations (W1, W2 and W3) and flame cutting station (F)	0.39	0.39	0.39	-	-	-	-	0.04	0.04
abrasive blasting operation (AB)	9.81	8.44	8.44	-	-	-	-	-	-
metal coating operation (MC)	-	-	-	-	-	9.94	-	-	-
natural gas-fired space heaters (NG)	0.07	0.28	0.28	0.02	3.75	0.21	3.15	0.07	0.07
hand held machining operations	5.00	5.00	5.00	-	-	-	-	-	-
paved Roads	0.38	0.08	0.02	-	-	-	-	-	-
cleaners and solvent application	-	-	-	-	-	0.54	-	-	-
manual loading and unloading operations	5.00	5.00	5.00	-	-	-	-	-	-
Adhesive application operation (ADH-01)	0	0	0	0	0	7.81	0	0	0
Natural gas unit (ROTOLINE 1.65)	0.01	0.05	0.05	0.004	0.71	0.04	0.60	0.01	negl
Total PTE of Entire Source Excluding Fugitives	26.80 26.82	25.34 25.39	25.28 25.34	0.02 0.03	3.75 4.45	32.49 42.24	3.15 3.74	0.578 0.578	0.578 0.578 (Hexane)
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
MSOP Threshold	25	25	25	25	25	25	-	-	-

negl. = negligible
 * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".
 **PM_{2.5} listed is direct PM_{2.5}.
 *** The emissions are after integral control (baghouse (BH1)).

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source after issuance of this revision. The table below was generated from the above table, with bold text un-bolded and strikethrough text deleted.

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source After Amendment (tons/year)								
	PM	PM10*	PM2.5**	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP
plastic molding operations (PM1 and PM2)	-	-	-	-	-	0.34	-	0.03	0.03
plastic grinding operation (PG)	5.00	5.00	5.00	-	-	-	-	-	-
wood working operation (WW)	1.15 ***	1.15 ***	1.15 ***	-	-	-	-	-	-
ink stamping operation (IS)	-	-	-	-	-	21.46	-	0.42	0.42
welding stations (W1, W2 and W3) and flame cutting station (F)	0.39	0.39	0.39	-	-	-	-	0.04	0.04
abrasive blasting operation (AB)	9.81	8.44	8.44	-	-	-	-	-	-
metal coating operation (MC)	-	-	-	-	-	9.94	-	-	-
natural gas-fired space heaters (NG)	0.07	0.28	0.28	0.02	3.75	0.21	3.15	0.07	0.07
hand held machining operations	5.00	5.00	5.00	-	-	-	-	-	-
paved Roads	0.38	0.08	0.02	-	-	-	-	-	-
cleaners and solvent application	-	-	-	-	-	0.54	-	-	-
manual loading and unloading operations	5.00	5.00	5.00	-	-	-	-	-	-
Adhesive application operation (ADH-01)	0	0	0	0	0	7.81	0	0	0
Natural gas unit (ROTOLINE 1.65)	0.01	0.05	0.05	0.004	0.71	0.04	0.60	0.01	negl
Total PTE of Entire Source Excluding Fugitives	26.82	25.39	25.34	0.03	4.45	42.24	3.74	0.58	0.8 (Hexane)
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
MSOP Threshold	25	25	25	25	25	25	-	-	-
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". **PM _{2.5} listed is direct PM _{2.5} . *** The emissions are after integral control (baghouse (BH1)).									

MSOP Status

- (1) Criteria Pollutants
 This amendment to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the entire source will still be less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).

- (2) HAPs
This amendment will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

- (a) New Source Performance Standards (NSPS)
There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this amendment.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAP)
There are no National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included for this amendment.
- (c) Compliance Assurance Monitoring (CAM)
Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
This source is still not subject to 326 IAC 2-2 after this Administrative Amendment because the potential to emit all PSD regulated pollutants are still less than 250 tons per year.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The amendment is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

See PTE of the Entire Source After Issuance of the MSOP Amendment Section above.
- (d) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (e) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Adhesive Operation

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The adhesive application operation does not emit particulate, therefore it is not subject to 326 IAC 6-3-1.
- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The unlimited VOC potential emissions from the adhesive application operation is less than twenty-five (25) tons per year. Therefore, the adhesive application operation is not subject to the requirements of 326 IAC 8-1-6.

Natural gas-fired combustion unit

- (a) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
 The natural gas-fired combustion unit is not subject to the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.
- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
 The unlimited VOC potential emissions from the natural gas-fired combustion unit is less than twenty-five (25) tons per year. Therefore, it is not subject to the requirements of 326 IAC 8-1-6.

Compliance Determination, Monitoring and Testing Requirements

There are no changes to compliance determination and monitoring requirements as a result of this amendment.

Proposed Changes

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

- (1) The new units have been added as item (i) to Section A.2 and Section D.1 and the following items were re-numbers.
 ...
 - (i) **One (1) adhesive application operation, identified as ADH-01, approved in 2016 for construction, using hand application method, with a maximum capacity of 0.40 gallons/hour of adhesive, without control and exhausting to inside.**
 - (ij) Natural gas-fired space heaters, collectively identified as NG, approved in 2015 **and 2016** for construction, without control, exhausting inside and consisting of the following:

Unit	# of Units	Maximum Heat Input Capacity (MMBtu/hr) each
MODINE	2	0.1
ROBERTS GORDON	2	0.2
ROBERTS GORDON	6	0.1
DAYTON	2	0.2
DAYTON	2	0.2
DAYTON	2	0.1
DAYTON	2	0.1
BRYANY	8	0.2
CARRIER AIR	2	0.2
MAGIC CHEF	1	0.2
RENZOR	1	0.2
RENZOR	3	0.2
RENZOR	1	0.2
YORK	1	0.1
ROTOLINE 3.0	1	1.9
ROTOLINE 2.5	1	1.2
ROTOLINE 1.65	1	1.65
Total	3738	5.316.96

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

....

- (i) **One (1) adhesive application operation, identified as ADH-01, approved in 2016 for construction, using hand application method, with a maximum capacity of 0.40 gallons of adhesive, without control and exhausting to inside.**
- (ij) Natural gas-fired space heaters, collectively identified as NG, approved in 2015 **and 2016** for construction, without control, exhausting inside and consisting of the following:

Unit	# of Units	Maximum Heat Input Capacity (MMBtu/hr) each
MODINE	2	0.1
ROBERTS GORDON	2	0.2
ROBERTS GORDON	6	0.1
DAYTON	2	0.2
DAYTON	2	0.2
DAYTON	2	0.1
DAYTON	2	0.1
BRYANY	8	0.2
CARRIER AIR	2	0.2
MAGIC CHEF	1	0.2
RENZOR	1	0.2
RENZOR	3	0.2
RENZOR	1	0.2
YORK	1	0.1
ROTOLINE 3.0	1	1.9
ROTOLINE 2.5	1	1.2
ROTOLINE 1.65	1	1.65
Total	3738	5.316.96

- (jk) Hand held machining operations.

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

...

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application submitted by the applicant. An application for the purposes of this review was received on April 14, 2016.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Ms. Renee Traivaranon 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) 234-5615 or toll free at 1-800-451-6027 extension 4-5615.
- (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>.

Emissions Summary

Emission Units	Uncontrolled Potential to Emit (PTE) (tons/year)										
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP	
plastic molding operations (PM1 and PM2)	-	-	-	-	-	0.34	-	-	0.03	0.03	Acetaldehyde
plastic grinding operation (PG)	5.00	5.00	5.00	-	-	-	-	-	-	-	-
wood working operation (WW)	1.15 *	1.15 *	1.15 *	-	-	-	-	-	-	-	-
ink stamping operation (IS)	-	-	-	-	-	21.46	-	-	0.42	0.42	Naphthalene
welding stations (W1, W2 and W3) and flame cutting station (F)	0.39	0.39	0.39	-	-	-	-	-	0.04	0.04	Manganese
abrasive blasting operation (AB)	9.81	8.44	8.44	-	-	-	-	-	-	-	-
metal coating operation (MC)	-	-	-	-	-	9.94	-	-	-	-	-
natural gas-fired space heaters (NG)	0.07	0.28	0.28	0.02	3.75	0.21	3.15	0.09	0.07	0.07	Hexane
hand held machining operations	5.00	5.00	5.00	-	-	-	-	-	-	-	-
paved Roads	0.38	0.08	0.02	-	-	-	-	-	-	-	-
cleaners and solvent application	-	-	-	-	-	0.54	-	-	-	-	-
manual loading and unloading operations	5.00	5.00	5.00	-	-	-	-	-	-	-	-
Adhesive (ADH-01)	-	-	-	-	-	9.72	-	-	-	-	-
ROTOLINE1.65	0.01	0.05	0.05	0.004	0.71	0.04	0.60	-	0.013	0.01	Hexane
Total PTE	26.82	25.39	25.34	0.03	4.45	42.24	3.74	0.09	0.58	0.08	Hexane

* The emissions are after integral control (baghouse (BH1)).

welding stations (W1, W2 and W3) and flame cutting station (F)

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Submerged Arc	0	0		0.036	0.011			0.000	0.000	0.000		0.000
Metal Inert Gas (MIG)(carbon steel)	1	1		0.0052	0.00318	0.00001	0.00001	0.005	0.003	0.000	0.00001	0.003
Stick (E7018 electrode)	0	0		0.0211	0.0009			0.000	0.000	0.000	0	0.000
Tungsten Inert Gas (TIG)(carbon steel)	1	1		0.0052	0.00318	0.00001	0.00001	0.005	0.003	0.000	0.00001	0.003
Oxyacetylene(carbon steel)	1	1		0.0052	0.00318	0.00001	0.00001	0.005	0.003	0.000	0.00001	0.003
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	1	0.5	15	0.1622	0.0005	0.0001	0.0003	0.073	0.000	0.000	0.000	0.000
Oxymethane	0	0	0	0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma**	0	0	0	0.0039				0.000	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								0.09	0.01	0.00	0.00	0.01
Potential Emissions lbs/day								2.13	0.23	0.00	0.00	0.24
Potential Emissions tons/year								0.39	0.0	0.0	0.0	0.04

Methodology:

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

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

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

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

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

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

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

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

Welding Electrode - ER70S-6

plastic grinding operation (PG)

material throughput rate (lbs/hr)	emission factors (lb/ton)			uncontrolled emission (tons/year)		
	PM	PM10	PM2.5	PM	PM10	PM2.5
10	17	1.7	1.7	0.37	0.037	0.037

Methodology

emission factors are from SCC# 3-04-003-60.

uncontrolled emission (tons/year) = [material throughput rate (lbs/hr) / 2000 (lbs/ton)] x emission factors (lb/ton) x 8760 (hrs/yr) / 2000 (lbs/ton)

metal coating operation (MC)

Material	Density (lb.gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Max Unit/hr	lbs VOC/gal of coating less water	Lbs VOC/gal of coating	Potential VOC lbs/hr	Potential VOC lbs/day	Potential VOC tpy	lb VOC/gal solids
Pitt-Tech Gloss LTX Black	8.6	66.00%	0.00%	66.00%	0.00%	32.00%	0.20000	2	5.68	5.68	2.27	54.49	9.94	17.74

Methodology

Brush application method is used for coating. Therefore, the PM emissions are negligible.

Pounds of VOC/gal of coating less water = Density (lb/gal) x weight % organics / (1 - volume % water)

Pounds of VOC/gal coating = (Density (lb/gal) x weight % organics)

Potential VOC lbs/hr = Lbs VOC/gal coating x Gal/unit x units/hr

Potential VOC lbs/day = Lbs of VOC/gal x gal/unit x units/hr x 24 hrs/day

Potential VOC tpy = lbs of VOC/gal x gal/unit x units/hr x 8760 hr/yr x (1 ton/2000lb)

Pounds VOC/gal of solids = (density x weight & organics)/(Volume % solids)

ink stamping operation (IS)

Material	Density (lb/gallon)	VOC (lbs/gal)	HAP (Naphthalene) content (wt.%)	Throughput (gal/hr)	Potential VOC Emissions (tons/yr)	Potential HAPs Emissions (tons/yr)
Black Ink	8.3	4.9	-	1	21.46	-
Black 8900 Series	9.58	0.92	1	1	0.42	0.42
worst case					21.46	0.42

Methodology

Potential VOC Emissions (tons/yr) = Density (lb/gallon) x VOC (lbs/gal) x [8760 (hrs/yr) / 2000 (lbs/ton)]

Potential HAPs Emissions (tons/yr) = Density (lb/gallon) x [HAP (Naphthalene) content (wt.%) / 100] x 8760 (hrs/yr) / 2000 (lbs/ton)

wood working operation (WW)

Sawdust Generation (lbs/hr)	PTE of PM/PM10/PM2.5 before integral controls (tons/yr)	Control Efficiency	PTE of PM/PM10/PM2.5 after integral controls (lbs/hr)	PTE of PM/PM10/PM2.5 after integral controls (tons/yr)
5	23.05	95%	0.26	1.15

Methodology

PTE of PM/PM10/PM2.5 Before Integral Controls (tons/yr) = Sawdust Generation (lbs/hr) x [1/(Control Efficiency (%))] x (8760 hours x 1 ton/2000 lbs)

PTE of PM/PM10/PM2.5 After Integral Controls (lbs/hr) = [(Sawdust Generation lbs/hr) x (1 - Control Efficiency %)] / Control Efficiency %

PTE of PM/PM10/PM2.5 After Integral Controls (tons/yr) = (PTE of PM/PM10/PM2.5 After Integral Controls (lbs/hr)) x [8760 (hrs/yr) / 2000 (lbs/ton)]

plastic molding operations (PM1 and PM2)

Unit	Capacity (lbs/hr)	Emission Factor		Potential Emissions (tons/yr)	
		VOC (lbs/ton)	HAPs (lbs/ton)	VOC	HAP's
Roto 2.5	77.200	1.0	0.100	0.169	0.017
Roto 3.0	77.200	1.0	0.100	0.169	0.017
Totals				0.338	0.034

Methodology

Potential Emissions (tons/yr) = Emission Factor (lbs/ton) x (Capacity (lbs/hr) / 2000 (lbs/ton)) x 8760 (hr/yr) / 2000 (lbs/ton)

Emission factors for Polyethylene processing were developed by Wisconsin Department of Natural Resources, based on stack testing of polyethylene manufacturing sources as issued in New Source Construction and FESOP No. 179-24865-00024, issued on January 9, 2008.

hand held machining operations

PM (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)
less than 5	less than 5	less than 5

Methodology

Conservatively it is assumed that particulate emissions from these Hand-held equipment activities does not exceed exemption level specified in 326 IAC 2-1.1-3(e)(1)(Exemptions level).

manual loading and unloading operations

PM (tons/yr)	PM10 (tons/yr)	PM2.5 (tons/yr)
less than 5	less than 5	less than 5

Methodology

Conservatively it is assumed that particulate emissions from these Hand-held equipment activities does not exceed exemption level specified in 326 IAC 2-1.1-3(e)(1)(Exemptions level).

cleaners and solvent application

Solvent Density (lbs/gallon)	Solvent Usage (gallons/year)	VOC emissions (lbs/day)	Potential VOC Emissions (tons/yr)
7.4	145	2.94	0.54

Methodology

Potential VOC Emissions (tons/yr) = Solvent Density (lbs/gallon) x Solvent Usage (gallons/year) x 1/2000 (ton/lb)

abrasive blasting operation (AB)

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor (EF)	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487
Other	156

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate (FR1) of sand through a blasting nozzle as a function of nozzle pressure and internal diameter (ID1)

Nozzle Type (diameter)	Internal diameter, in	Nozzle Pressure (psig)							
		30	40	50	60	70	80	90	100
No. 2 (1/8 inch)	0.125	28	35	42	49	55	63	70	77
No. 3 (3/16 inch)	0.1875	65	80	94	107	122	135	149	165
No. 4 (1/4 inch)	0.25	109	138	168	195	221	255	280	309
No. 5 (5/16 inch)	0.3125	205	247	292	354	377	420	462	507
No. 6 (3/8 inch)	0.375	285	355	417	477	540	600	657	720
No. 7 (7/16 inch)	0.4375	385	472	560	645	755	820	905	940
No. 8 (1/2 inch)	0.5	503	615	725	835	945	1050	1160	1265
No. 10 (5/8 inch)	0.625	820	990	1170	1336	1510	1680	1850	2030
No. 12 (3/4 inch)	0.75	1140	1420	1670	1915	2160	2400	2630	2880
No. 16 (1 inch)	1	2030	2460	2900	3340	3780	4200	4640	5060

CALCULATIONS

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters	
Flow Rate (FR) = Abrasive flow rate (lb/hr) of abrasive at nozzle pressure and internal nozzle diameter (ID)	
D1 = Density of Abrasive from Table 2 =	487 lb/ft3
ID1 = Internal diameter of nozzle for sand blasting from Table 3 =	0.44 inch
FR1 = Sand flow rate at nozzle pressure and internal diameter (ID1) from Table 3 =	560 lb/hr
D = Density of actual abrasive =	487 lb/ft3
ID = internal diameter of actual nozzle =	0.44 inch
FR = Flow rate of actual abrasive (lb/hr) =	560.0 lb/hr (per nozzle)

Potential to Emit Before Control		
FR = Flow rate of actual abrasive (lb/hr) =	560.0 lb/hr (per nozzle)	
w = fraction of time of wet blasting =	0 %	
N = number of nozzles =	1	
EF = PM emission factor for actual abrasive from Table 1 =	0.004 lb PM/ lb abrasive	
PM10 emission factor ratio for actual abrasive from Table 1 =	0.86 lb PM10 / lb PM	
Potential to Emit (before control) =	2.240 lb/hr	
=	53.76 lb/day	
=	9.81 ton/yr	
	PM	PM10
Potential to Emit (before control) =	2.240	1.926
=	53.76	46.23
=	9.81	8.44

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

Flow rate of actual abrasive (FR) (lb/hr) = FR1 x (ID/ID1)^2 x (D/D1)

Potential to Emit (before control) = EF x FR x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50))

Potential to Emit (after control) = [Potential to Emit (before control)] * [1 - control efficiency]

Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]

paved Roads

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	40.0	1.0	40.0	15.0	600.0	100	0.019	0.8	276.5
Vehicle (leaving plant) (one-way trip)	40.0	1.0	40.0	15.0	600.0	100	0.019	0.8	276.5
Totals			80.0		1200.0			1.5	553.0

Average Vehicle Weight Per Trip =

15.0

 tons/trip
Average Miles Per Trip =

0.02

 miles/trip

Unmitigated Emission Factor, Ef = $[k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	15.0	15.0	15.0	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities-Table 13.2.1-3

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, Eext = $E_f * [1 - (p/4N)]$
where p =

125

 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N =

365

 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	1.377	0.275	0.0676	lb/mile
Mitigated Emission Factor, Eext =	1.259	0.252	0.0618	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.19	0.04	0.01	0.17	0.03	0.01
Vehicle (leaving plant) (one-way trip)	0.19	0.04	0.01	0.17	0.03	0.01
Totals	0.38	0.08	0.02	0.35	0.07	0.02

Methodology

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

Abbreviations

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

natural gas-fired space heaters (NG)

Unit	# of Units	Maximum Heat Input Capacity (MMBtu/hr)	High Heat Value (MMBtu/MMscf)	Potential Throughput (MMcf/yr)
MODINE	2	0.1	1020	1.72
ROBERTS GORDON	2	0.2	1020	2.58
ROBERTS GORDON	6	0.1	1020	6.44
DAYTON	2	0.2	1020	3.44
DAYTON	2	0.2	1020	2.75
DAYTON	2	0.1	1020	2.06
DAYTON	2	0.1	1020	1.03
BRYANY	8	0.2	1020	13.74
CARRIER AIR	2	0.2	1020	3.44
MAGIC CHEF	1	0.2	1020	1.29
RENZOR	1	0.2	1020	2.14
RENZOR	3	0.2	1020	5.15
RENZOR	1	0.2	1020	1.43
YORK	1	0.1	1020	1.09
ROTOline 3.0	1	1.9	1020	16.32
ROTOline2.5	1	1.2	1020	10.31
Totals	37.00	5.31		74.9

	Pollutant						
	PM*	PM ₁₀ *	direct PM _{2.5} *	SO ₂	NO _x	VOC	CO
Emission Factor (lb/MMCF)	1.9	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission (tons/yr)	0.07	0.3	0.28	0.0	3.7	0.2	3.1

*PM emission factor is filterable PM only. PM₁₀ emission factor is filterable and condensable PM₁₀ combined. PM_{2.5} emission factor is filterable and condensable PM_{2.5} combined.

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-03	1.8E+00	3.4E-03
Potential Emission (tons/yr)	7.865E-05	4.494E-05	2.809E-03	6.742E-02	1.273E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission (tons/yr)	1.873E-05	4.120E-05	5.243E-05	1.423E-05	7.865E-05
Total HAPs:					7.068E-02

	Greenhouse Gas		
	CO ₂	CH ₄	N ₂ O
Emission Factor (lb/MMSCF)	120,000	2.3	2.2
Potential Emission (tons/yr)	4,494	0.1	0.1
Summed Potential Emissions (tons/yr)	4,495		
CO ₂ e Total (tons/yr)	4,522		

Notes:

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.
Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Methodology:

Total Heat Input Capacity (MMBtu/hr) = Σ (Heat Input Capacity Each (MMBtu/hr/unit) * Number of Units)
Potential Throughput (MMCF/yr) = Heat Input Capacity Each (MMBtu/hr) * Number of Units * 8,760 hrs/yr * High Heat Value (1 MMCF/1,020 MMBtu)
Potential Emission (tons/yr) = Total Max Throughput (MMCF/yr) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs
CO₂e (tons/yr) = CO₂ Potential Emission ton/yr x CO₂ GWP (1) + CH₄ Potential Emission ton/yr x CH₄ GWP (21) + N₂O Potential Emission ton/yr x N₂O GWP (310).

metal coating operation (MC)

Material	Density (lb.gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Max Unit/hr	lbs VOC/gal of coating less water	Lbs VOC/gal of coating	Potential VOC lbs/hr	Potential VOC lbs/day	Potential VOC tpy	lb VOC/gal solids
Adhesive operation	6.7554	66.00%	0.00%	66.00%	0.00%	32.00%	0.20000	2	4.46	4.46	1.78	42.80	7.81	13.93

Methodology

Brush application method is used for coating. Therefore, the PM emissions are negligible.

Pounds of VOC/gal of coating less water = Density (lb/gal) x weight % organics / (1-volume % water)

Pounds of VOC/gal coating = (Density (lb/gal) x weight % organics)

Potential VOC lbs/hr = Lbs VOC/gal coating x Gal/unit x units/hr

Potential VOC lbs/day = Lbs of VOC/gal x gal/unit x units/hr x 24 hrs/day

Potential VOC tpy = lbs of VOC/gal x gal/unit x units/hr x 8760 hr/yr x (1 ton/2000lb)

Pounds VOC/gal of solids = (density x weight & organics)/(Volume % solids)

natural gas-fired Rotoline 1.65

Unit	# of Units	Maximum Heat Input Capacity (MMBtu/hr)	High Heat Value (MMBtu/MMscf)	Potential Throughput (MMcf/yr)
ROTOLINE1.65	1	1.7	1020	14.17
Totals	1.00	1.65		14.2

	Pollutant						
	PM*	PM ₁₀ *	direct PM _{2.5} *	SO ₂	NO _x	VOC	CO
Emission Factor (lb/MMCF)	1.9	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission (tons/yr)	0.01	0.05	0.05	0.004	0.71	0.04	0.60

*PM emission factor is filterable PM only. PM₁₀ emission factor is filterable and condensable PM₁₀ combined. PM_{2.5} emission factor is filterable and condensable PM_{2.5} combined.

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission (tons/yr)	1.488E-05	8.502E-06	5.314E-04	1.275E-02	2.409E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission (tons/yr)	3.543E-06	7.794E-06	9.919E-06	2.692E-06	1.488E-05
	Total HAPs:				1.337E-02

Notes:

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

Methodology:

Total Heat Input Capacity (MMBtu/hr) = Σ (Heat Input Capacity Each (MMBtu/hr/unit) * Number of Units)

Potential Throughput (MMCF/yr) = Heat Input Capacity Each (MMBtu/hr) * Number of Units * 8,760 hrs/yr * High Heat Value (1 MMCF/1,020 MMBtu)

Potential Emission (tons/yr) = Total Max Throughput (MMCF/yr) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Mr. Michael Barnhill
Gator Cases, Inc.
2499 South 600 East
Columbia City, Indiana 46725

DATE: May 11, 2016

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
MSOP – Administrative Amendment
183-37074-00049

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Jason Morrison, SevenGen
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 2/17/2016

Mail Code 61-53

Whitley Co.

IDEM Staff	VBIDDLE 5/10/2016 Gator Cases Inc 183-37074-00049		FINAL	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

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1		Michael Barnhill Gator Cases Inc 2499 S 600 E Columbia City IN 46725 (Source CAATS)	VIA	CERTIFIED MAIL	USPS							
2		Mr. Janel Rogers 2050 E Linker Rd Columbia City IN 46725 (Affected Party)										
3		Mr. Nondus Carr 1760 South 500 East Columbia City IN 46725 (Affected Party)										
4		Mr. Thomas E. Delaney 2640 East 400 Columbia City IN 46725 (Affected Party)										
5		Mr. Robert F. Taylor 7856 S 800 E-92 Fort Wayne IN 46814 (Affected Party)										
6		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
7		Whitley County Commissioners 220 West Van Buren Street Suite 207 Columbia City IN 46725 (Local Official)										
8		Duane & Deborah Clark Clark Farms 6973 E. 500 S. Columbia City IN 46725 (Affected Party)										
9		Gene Donaghy Northeastern REMC 4901 E. Park 30 Drive Columbia City IN 46725-8790 (Affected Party)										
10		Mr. Lynn Weirick 3954 E Old Trail Rd Columbia City IN 46725 (Affected Party)										
11		Whitley County Health Department 220 West Van Buren Steetr Suite 111 Columbia City IN 46725-2056 (Health Department)										
12		Ms. Camille Amiri News Channel 15 2915 W State Blvd Fort Wayne IN 46808 (Affected Party)										
13		Charles Acheson 4655 S. 700 East Columbia City IN 46725 (Affected Party)										
14		Michael Gayle 1315 S. 500 East Columbia City IN 46725 (Affected Party)										
15		Columbia City Council and Mayors Office 112 South Chauncey Street Columbia City IN 46725 (Local Official)										

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IDEM Staff	VBIDDLE 5/10/2016 Gator Cases Inc. 183- 37074-00049		FINAL	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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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		Jason SevenGen 604 West Wayne Street Fort Wayne IN 46802 (Consultant)										
2		Shively Warehouse 2540 S 600 E Columbia City IN 46725 (Affected Party)										
3		Essex Group, Inc. 2601 S 600 E Columbia City IN 46725 (Affected Party)										
4		Chroma Properties, LLC 2433 S 600 E Columbia City IN 46725 (Affected Party)										
5		Christ Neidermeyer 6366 E Yellow River Road Columbia City IN 46725 (Affected Party)										
6												
7												
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