



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

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

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## **NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT**

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

for Ilpea Industries, Inc. in Scott County

Significant Revision No.: 143-37097-0018

The Indiana Department of Environmental Management (IDEM) has received an application from Ilpea Industries, Inc., located at 1320 South Main Street, Scottsburg, Indiana for a significant revision of its FESOP issued on August 5, 2013. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow Ilpea Industries, Inc. to make certain changes at its existing source. Ilpea Industries, Inc. has applied to construct and operate a new plastic pellet production line, revise the maximum capacities of existing units, and notify IDEM of emission units that have been removed or will not be constructed at this source.

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

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

Scott County Public Library  
108 South Main Street  
Scottsburg, IN 47170

and

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

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

### **How can you participate in this process?**

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

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

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR 143-37097-00018 in all correspondence.

**Comments should be sent to:**

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

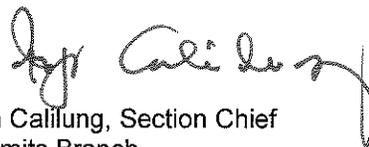
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have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

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

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

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

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



Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality



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**Carol S. Comer**  
*Commissioner*

Ms. Heidi Morris  
Ilpea Industries, Inc.  
745 South Gardner Street  
Scottsburg, IN 47170

Re: 143-37097-00018  
Significant Revision to  
F143-32451-00018

Dear Ms. Morris:

Ilpea Industries, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F143-32451-00018 on August 5, 2013 for a stationary plastics and magnetic plastics manufacturing operation located at 1320 South Main Street, Scottsburg, Indiana. On April 19, 2016, the Office of Air Quality (OAQ) received an application from the source requesting to construct and operate a new plastic pellet production line, revise the maximum capacities of existing units, and notify IDEM of emission units that have been removed or will not be constructed at this source. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

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

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

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

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Brian Williams of my staff at 317-234-5375 or 1-800-451-6027, and ask for extension 4-5375.

Sincerely,

Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Technical Support Document and revised permit

IC/BMW

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



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## DRAFT

### New Source Review and Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Ilpea Industries Inc.  
1320 S. Main Street  
Scottsburg, Indiana 47170**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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

Operation Permit No.: F143-32451-00018	
Original signed by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 5, 2013  Expiration Date: August 5, 2023

Significant Permit Revision No.: F143-34316-00018, issued on July 7, 2014  
Significant Permit Revision No.: F143-35175-00018, issued on April 7, 2015

Significant Permit Revision No.: F143-37097-00018	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date:  Expiration Date: August 5, 2023



## TABLE OF CONTENTS

<b>SECTION A</b>	<b>SOURCE SUMMARY .....</b>	<b>4</b>
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
<b>SECTION B</b>	<b>GENERAL CONDITIONS.....</b>	<b>9</b>
B.1	Definitions [326 IAC 2-8-1]	
B.2	Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-8-6][IC 13-17-12]	
B.5	Severability [326 IAC 2-8-4(4)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7	Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8	Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.9	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11	Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]	
B.12	Emergency Provisions [326 IAC 2-8-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.15	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.16	Permit Renewal [326 IAC 2-8-3(h)]	
B.17	Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.18	Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.20	Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]	
B.21	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.22	Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]	
B.23	Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]	
<b>SECTION C</b>	<b>SOURCE OPERATION CONDITIONS.....</b>	<b>19</b>
	<b>Emission Limitations and Standards [326 IAC 2-8-4(1)] .....</b>	<b>19</b>
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Overall Source Limit [326 IAC 2-8]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1][IC 13-17-9]	
C.5	Incineration [326 IAC 4-2][326 IAC 9-1-2]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]	
C.9	Performance Testing [326 IAC 3-6]	
C.10	Compliance Requirements [326 IAC 2-1.1-11]	
C.11	Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]	
C.12	Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]	
	<b>Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)] .....</b>	<b>22</b>
C.13	Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]	
C.14	Risk Management Plan [326 IAC 2-8-4][40 CFR 68]	
C.15	Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]	

C.16	Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]	
	<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]</b>	<b>24</b>
C.17	General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]	
C.18	General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]	
	<b>Stratospheric Ozone Protection</b>	<b>25</b>
C.19	Compliance with 40 CFR 82 and 326 IAC 22-1	
<b>SECTION D.1</b>	<b>EMISSIONS UNIT OPERATION CONDITIONS</b>	<b>26</b>
	<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	<b>28</b>
D.1.1	PM PSD Minor Limit [326 IAC 2-2]	
D.1.2	Particulate Matter Less Than 10 Microns (PM10) and PM2.5 [326 IAC 2-2][326 IAC 2-8-4]	
D.1.3	Particulate Matter (PM) [326 IAC 6-3-2]	
D.1.4	Preventive Maintenance Plan [326 IAC 2-8-4(9)]	
	<b>Compliance Determination Requirements [326 IAC 2-8-4(1)]</b>	<b>30</b>
D.1.5	Particulate Control	
D.1.6	Testing Requirements [326 IAC 2-1.1-11]	
	<b>Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]</b>	<b>32</b>
D.1.7	Visible Emissions Notations	
D.1.8	Parametric Monitoring	
D.1.9	Broken or Failed Bag Detection	
D.1.10	Scrubber Failure Detection	
	<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]</b>	<b>34</b>
D.1.11	Record Keeping Requirements	
<b>SECTION D.2</b>	<b>EMISSIONS UNIT OPERATION CONDITIONS</b>	<b>36</b>
	<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	<b>36</b>
D.2.1	Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]	
<b>CERTIFICATION</b>		<b>37</b>
<b>EMERGENCY OCCURRENCE REPORT</b>		<b>38</b>
<b>QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT</b>		<b>40</b>

## SECTION A SOURCE SUMMARY

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

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

---

The Permittee owns and operates a stationary plastics and magnetic plastics manufacturing operation.

Source Address:	1320 S. Main Street, Scottsburg, Indiana 47170
General Source Phone Number:	812-752-2526
SIC Code:	3053 (Gaskets, Packaging and Sealing Devices) 3399 (Primary Metal Products, n.e.c.)
County Location:	Scott
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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The source consists of the following permitted emission units:

#### Plastic Pellet Process

The plastic pellet process blends PVC, filler and color and extrudes the mixture into plastic pellets.

#### (a) Storage Silos:

- (1) Two (2) polyvinyl chloride (PVC) silos, constructed in 1999, and approved in 2014 for modification, identified as EU-106, and EU-107, each with a maximum capacity of 5,480 tons per year, each with bin vent filters, and exhausting outdoors; and

The maximum capacity was revised from 7,950 tons per year to 5,480 tons per year in 2014.

- (2) One (1) calcium carbonate silo, constructed in 1999, identified as EU-108, with a maximum capacity of 7,950 tons per year with bin vent filters for control, and exhausting outdoors.

The PVC and calcium carbonate material is vacuumed from a rail car, equipped with a bin vent filter, to a silo and then vacuum fed into blenders. The process time in the blenders limits the production of plastic and the amount of calcium carbonate and PVC that can be used.

- (b) One (1) Banbury mixer, constructed in 1999, approved in 2016 for modification to exhaust to the outdoors, identified as EU-122, with a maximum capacity of 3,700 lbs per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122.

- (c) One (1) plastic pellet production line, approved in 2016 for construction, identified as EU-112, with a maximum capacity of 3,500 pounds per hour, uncontrolled, and exhausting to wall vent 112.
- (d) One (1) plastic pellet production line, constructed in 1999, identified as EU-113, with a maximum capacity of 700 pounds per hour, no control and exhausting to stack S-113.
- (e) One (1) plastic pellet production line, constructed in 1999, identified as EU-115, with a maximum capacity of 1,200 pounds per hour, no control and exhausting indoors.
- (f) One (1) plastic pellet production line, constructed in 1999, identified as EU-116, with a maximum capacity of 1,200 pounds per hour, no control and exhausting to stack S-116.
- (g) One (1) plastic pellet production line, constructed in 1999, identified as EU-117, with a maximum capacity of 1,500 pounds per hour, no control and exhausting indoors.
- (h) One (1) plastic pellet production line, constructed in 1999, identified as EU-118, with a maximum capacity of 1,500 pounds per hour, no control and exhausting indoors.

#### Powder Metal Process

- (i) One (1) iron oxide silo, constructed in 2014, identified as EU-103, with a maximum throughput capacity of 20 tons per day, for the unloading of iron oxide powder, using baghouse C-156 for control, and exhausting to stack S-156.
- (j) One (1) iron oxide silo, constructed in 2014, identified as EU-105, with a maximum throughput capacity of 20 tons per day, for the unloading of iron oxide powder, using baghouse C-157 for control, and exhausting to stack S-157.
- (k) One (1) weigh hopper, constructed in 2014, and approved in 2015 for modification, identified as EU-156, with a maximum capacity of 40,000 lbs per day of iron oxide, venting to silo EU-103.
- (l) One (1) weigh hopper, approved in 2013 for construction, approved in 2015 for modification to remove a baghouse, and approved in 2016 to correct the maximum capacity, identified as EU-157, with a maximum capacity of 40,000 lbs per day of iron oxide, venting to silo EU-105.
- (m) One (1) Cibec Mixer, constructed in 2014, modified in 2015 to remove a baghouse and correct the maximum capacity, and approved in 2016 for modification to increase the maximum number of batches per day, identified as EU-123C, with a maximum capacity of 8,000 pounds of iron oxide, 1,360 lbs of strontium carbonate, 170 lbs of ferric chloride, per batch, eight (8) batches per day, using no control, and exhausting indoors.
- (n) One (1) Cibec Mixer, approved in 2014 for construction, approved in 2015 for modification to remove a baghouse and correct the maximum capacity, and approved in 2016 for modification to increase the maximum number of batches per day, identified as EU-125, with a maximum capacity of 8,000 pounds of iron oxide, 1,360 lbs of strontium carbonate, 170 lbs of ferric chloride, per batch, eight (8) batches per day, using no control, and exhausting indoors.
- (o) One (1) weigh hopper, constructed in 2014, identified as EU-158, with a maximum capacity of 870 pounds of Strontium Carbonate per hour, using a baghouse for control, identified as C-158, and exhausting indoors.

- (p) One (1) weigh hopper, approved in 2014 for construction, identified as EU-159, with a maximum capacity of 870 pounds of Strontium Carbonate per hour, using a baghouse for control, identified as C-159, and exhausting indoors.
- (q) One (1) rotary calcining kiln, constructed in 2014, identified as EU-101, with a maximum capacity of 3,000 lbs of iron oxide per hour, using a wet scrubber (identified as C-101-2) as control, and exhausting to stack S-101-2.
- (r) One (1) rotary calcining kiln, approved in 2013 for construction, identified as EU-102, with a maximum capacity of 3,500 lbs of iron oxide per hour, using a wet scrubber (identified as C-102-2) as control, and exhausting to stack S-101-2.

Iron Oxide (from silos) and Strontium Carbonate (bags) are fed into the kilns and heated to form iron clinkers. The clinkers are milled from large particle size to a very fine powder which is used to make magnetic plastic. The milled material is sent to the Banbury mixer so plastic material can be added to form a compound and extruded to form magnetic plastic strips and rolls for plastic magnets.

Each above item (q and r) is served by its own scrubber, but they are exhausting to the same stack S-101-2.

- (s) One (1) Moritz Mill, constructed in 2014, identified as EU-152, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-152, and exhausting indoors.
- (t) One (1) Moritz Mill, constructed in 2014, identified as EU-153, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-153, and exhausting indoors.
- (u) One (1) Moritz Mill, approved in 2013 for construction, approved in 2014 for modification, identified as EU-154, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-154, and exhausting indoors.

The above unit was approved in 2013 for construction, but the maximum capacity was revised from 2,380 lbs per hour to 1,700 lbs per hour in 2014.

- (v) One (1) twin banbury/extruder/mixer line, constructed in 2013, approved in 2016 to correct the maximum capacity, identified as EU-123B, with a maximum capacity of 3,000 pounds per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122, and consisting of the following:
  - (1) One (1) 275- liter capacity mixer, and
  - (2) Two (2) twin banbury extruders/mixers

The banbury mixes powder metal and plastic together to form a magnetic compound. Ingredients used are tin chloride-halogenated activator, textile mordant, antioxidant (coba, BAS, special chem 4polymers), stearic acid, black concentrate, process oil, PP melt flow 6, phenolic resin in mineral oil, 40% extended EPDM, rubee grade zinc oxide, talc from imerys.

The baghouse C-122 is a common control device used for twin banbury/extruder/mixer line EU-123B and Banbury Mixer EU-122.

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

The source also consists of the following insignificant activities:

- (a) One (1) natural gas-fired air make-up unit, constructed in 1999, identified as EU-119, with a maximum heat input of 1.1 MMBtu per hour, exhausting to stack S-119.
- (b) Four (4) natural gas-fired space heaters, constructed in 1999, identified as EU-136, EU-141, EU-142, and EU-143, with a maximum heat input of 0.14 MMBtu per hour each, exhausting to stacks S-136, S-141, S-142, and S-143.
- (c) Eight (8) natural gas-fired space heaters, constructed in 1999, identified as EU-137, EU-138, EU-139, EU-140, EU-144, EU-145, EU-146, and EU-147, with a maximum heat input of 0.25 MMBtu per hour each, exhausting to stacks S-137, S-138, S-139, S-140, S-144, S-145, S-146, and S-147.
- (d) Two (2) natural gas-fired space heaters, constructed in 1999, identified as EU-148 and EU-149, with a maximum heat input of 0.40 MMBtu per hour each, exhausting to stacks S-148 and S-149.
- (e) One (1) natural gas-fired Cleaver Brooks boiler, constructed in 1999, identified as EU-151, with a maximum heat input of 2.5 MMBtu per hour, exhausting to stack S-151.
- (f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: cutting torches, soldering equipment, and welding equipment.
- (g) Repair activities, including the following: Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (h) Conveyors as follows: enclosed systems for conveying plastic raw materials and plastic finished goods.
- (i) Routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process, including the following: purging of gas lines, purging of vessels.
- (j) Blowdown for a cooling tower.
- (k) Emissions from a laboratory as defined in 326 IAC 2-7-1(21)(D).
- (l) Emissions from research and development activities as defined in 326 IAC 2-7-1(21)(D).
- (m) Waste water pre-treatment system, with an oil and grease content less than one percent (1) by volume.
- (n) Nine (9) splicing tables to weld corners of plastic extruded strips, with a throughput of 280 splices per hour, and exhausting indoors.
- (o) Eleven (11) magnetic extrusion lines, each with a throughput of 450 lbs per hour, no control, and exhausting indoors.
- (p) Five (5) plastic extrusion lines, each with a throughput of 300 lbs per hour, no control, and exhausting indoors.
- (r) Four (4) natural gas-fired space heaters, installed in 2014, identified as EU-170, EU-171, EU-172, EU-173, with a maximum heat input of 0.4 MMBtu per hour each.

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

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

## **SECTION B GENERAL CONDITIONS**

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

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

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

- (a) This permit, F143-32451-00018, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

### **B.3 Term of Conditions [326 IAC 2-1.1-9.5]**

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

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

### **B.4 Enforceability [326 IAC 2-8-6][IC 13-17-12]**

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

### **B.5 Severability [326 IAC 2-8-4(4)]**

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

### **B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

### **B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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

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

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

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The

PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

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

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Southwest Regional Office and Southeast Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865  
Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304,  
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

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

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

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

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

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

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

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

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

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to F143-32451-00018 and issued pursuant to permitting programs approved into the state implementation plan have been either:

- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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

**B.16 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

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

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

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

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

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

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

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

B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per twelve (12) consecutive month period.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## **Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

### **C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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

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

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

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

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

### **C.12 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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

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

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

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

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

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

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

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

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

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

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

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

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

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

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

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

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

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

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

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

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

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

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

- (b) The address for report submittal is:

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

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

### **Stratospheric Ozone Protection**

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

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

#### Plastic Pellet Process

The plastic pellet process blends PVC, filler and color and extrudes the mixture into plastic pellets.

#### (a) Storage Silos:

- (1) Two (2) polyvinyl chloride (PVC) silos, constructed in 1999, and approved in 2014 for modification, identified as EU-106, and EU-107, each with a maximum capacity of 5,480 tons per year, each with bin vent filters, and exhausting outdoors; and

The maximum capacity was revised from 7,950 tons per year to 5,480 tons per year in 2014.

- (2) One (1) calcium carbonate silo, constructed in 1999, identified as EU-108, with a maximum capacity of 7,950 tons per year with bin vent filters for control, and exhausting outdoors.

The PVC and calcium carbonate material is vacuumed from a rail car, equipped with a bin vent filter, to a silo and then vacuum fed into blenders. The process time in the blenders limits the production of plastic and the amount of calcium carbonate and PVC that can be used.

- (b) One (1) Banbury mixer, constructed in 1999, approved in 2016 for modification to exhaust to the outdoors, identified as EU-122, with a maximum capacity of 3,700 lbs per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122.
- (c) One (1) plastic pellet production line, approved in 2016 for construction, identified as EU-112, with a maximum capacity of 3,500 pounds per hour, uncontrolled, and exhausting to wall vent 112.
- (d) One (1) plastic pellet production line, constructed in 1999, identified as EU-113, with a maximum capacity of 700 pounds per hour, no control and exhausting to stack S-113.
- (e) One (1) plastic pellet production line, constructed in 1999, identified as EU-115, with a maximum capacity of 1,200 pounds per hour, no control and exhausting indoors.
- (f) One (1) plastic pellet production line, constructed in 1999, identified as EU-116, with a maximum capacity of 1,200 pounds per hour, no control and exhausting to stack S-116.
- (g) One (1) plastic pellet production line, constructed in 1999, identified as EU-117, with a maximum capacity of 1,500 pounds per hour, no control and exhausting indoors.
- (h) One (1) plastic pellet production line, constructed in 1999, identified as EU-118, with a maximum capacity of 1,500 pounds per hour, no control and exhausting indoors.

#### Powder Metal Process

- (i) One (1) iron oxide silo, constructed in 2014, identified as EU-103, with a maximum throughput capacity of 20 tons per day, for the unloading of iron oxide powder, using baghouse C-156 for control, and exhausting to stack S-156.
- (j) One (1) iron oxide silo, constructed in 2014, identified as EU-105, with a maximum throughput capacity of 20 tons per day, for the unloading of iron oxide powder, using baghouse C-157 for control, and exhausting to stack S-157.
- (k) One (1) weigh hopper, constructed in 2014, and approved in 2015 for modification, identified as EU-156, with a maximum capacity of 40,000 lbs per day of iron oxide, venting to silo EU-103.
- (l) One (1) weigh hopper, approved in 2013 for construction, approved in 2015 for modification to remove a baghouse, and approved in 2016 to correct the maximum capacity, identified as EU-157, with a maximum capacity of 40,000 lbs per day of iron oxide, venting to silo EU-105.
- (m) One (1) Cibec Mixer, constructed in 2014, modified in 2015 to remove a baghouse and correct the maximum capacity, and approved in 2016 for modification to increase the maximum number of batches per day, identified as EU-123C, with a maximum capacity of 8,000 pounds of iron oxide, 1,360 lbs of strontium carbonate, 170 lbs of ferric chloride, per batch, eight (8) batches per day, using no control, and exhausting indoors.
- (n) One (1) Cibec Mixer, approved in 2014 for construction, approved in 2015 for modification to remove a baghouse and correct the maximum capacity, and approved in 2016 for modification to increase the maximum number of batches per day, identified as EU-125, with a maximum capacity of 8,000 pounds of iron oxide, 1,360 lbs of strontium carbonate, 170 lbs of ferric chloride, per batch, eight (8) batches per day, using no control, and exhausting indoors.
- (o) One (1) weigh hopper, constructed in 2014, identified as EU-158, with a maximum capacity of 870 pounds of Strontium Carbonate per hour, using a baghouse for control, identified as C-158, and exhausting indoors.
- (p) One (1) weigh hopper, approved in 2014 for construction, identified as EU-159, with a maximum capacity of 870 pounds of Strontium Carbonate per hour, using a baghouse for control, identified as C-159, and exhausting indoors.
- (q) One (1) rotary calcining kiln, constructed in 2014, identified as EU-101, with a maximum capacity of 3,000 lbs of iron oxide per hour, using a wet scrubber (identified as C-101-2) as control, and exhausting to stack S-101-2.
- (r) One (1) rotary calcining kiln, approved in 2013 for construction, identified as EU-102, with a maximum capacity of 3,500 lbs of iron oxide per hour, using a wet scrubber (identified as C-102-2) as control, and exhausting to stack S-101-2.

Iron Oxide (from silos) and Strontium Carbonate (bags) are fed into the kilns and heated to form iron klinkers. The klinkers are milled from large particle size to a very fine powder which is used to make magnetic plastic. The milled material is sent to the Banbury mixer so plastic material can be added to form a compound and extruded to form magnetic plastic strips and rolls for plastic magnets.

Each above item (q and r) is served by its own scrubber, but they are exhausting to the same stack S-101-2.

(s) One (1) Moritz Mill, constructed in 2014, identified as EU-152, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-152, and exhausting indoors.

(t) One (1) Moritz Mill, constructed in 2014, identified as EU-153, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-153, and exhausting indoors.

(u) One (1) Moritz Mill, approved in 2013 for construction, approved in 2014 for modification, identified as EU-154, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-154, and exhausting indoors.

The above unit was approved in 2013 for construction, but the maximum capacity was revised from 2,380 lbs per hour to 1,700 lbs per hour in 2014.

(v) One (1) twin banbury/extruder/mixer line, constructed in 2013, approved in 2016 to correct the maximum capacity, identified as EU-123B, with a maximum capacity of 3,000 pounds per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122, and consisting of the following:

- (1) One (1) 275- liter capacity mixer, and
- (2) Two (2) twin banbury extruders/mixers

The banbury mixes powder metal and plastic together to form a magnetic compound. Ingredients used are tin chloride-halogenated activator, textile mordant, antioxidant (coba, BAS, special chem 4polymers), stearic acid, black concentrate, process oil, PP melt flow 6, phenolic resin in mineral oil, 40% extended EPDM, rubee grade zinc oxide, talc from imerys.

The baghouse C-122 is a common control device used for twin banbury/extruder/mixer line EU-123B and Banbury Mixer EU-122.

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

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

**D.1.1 PM PSD Minor Limit [326 IAC 2-2]**

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the PM emissions after control from each unit shall not exceed the following:

Control Device	Emission Units	PM Limitations (lb/hr)	
Wet Scrubber (C-101-2) (Stack S101-2)	Rotary Calcining Kiln (EU-101)	5.38*	11.35*
Wet Scrubber (C-102-2) (Stack S-101-2)	Rotary Calcining Kiln (EU-102)	5.97*	
C-152 (exhausting indoors)	Moritz Mill (EU-152)	3.68	
C-153 (exhausting indoors)	Moritz Mill (EU-153)	3.68	
C-154 (exhausting indoors)	Moritz Mill (EU-154)	3.68	

Control Device	Emission Units	PM Limitations (lb/hr)
C-156 (exhausting Stack S-156)	Iron Oxide Silo (EU-103)	1.19
C-157 (exhausting Stack S-157)	Iron Oxide Silo (EU-105)	1.19
C-158 (exhausting indoors)	Weigh Hopper (EU158)	4.30
C-159 (exhausting indoors)	Weigh Hopper (EU-159)	4.30
C-122 (Stack S-122)	Banbury Mixer (EU-122)	0.89
	Twin Banbury/Extruder/Mixer Line (EU-123B)	

\*This is to provide operational flexibility if in case the source constructs one of 2 scrubbers at different time.

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

**D.1.2 Particulate Matter Less Than 10 Microns (PM10) and PM2.5 [326 IAC 2-2][326 IAC 2-8-4]**

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the PM10 and PM2.5 emissions after control from each unit shall not exceed the following:

Control Device	Emission Units	PM10 Limitations (lb/hr)		PM2.5 Limitations (lb/hr)	
Wet Scrubber (C-101-2) (Stack S-101-2)	Rotary Calcining Kiln (EU-101)	0.95*	2.06*	0.95*	2.06*
		1.11*		1.11*	
Wet Scrubber (C-102-2) (Stack S-101-2)	Rotary Calcining Kiln (EU-102)	1.11*		1.11*	
C-152 (exhausting indoors)	Moritz Mill (EU-152)	3.68		3.68	
C-153 (exhausting indoors)	Moritz Mill (EU-153)	3.68		3.68	
C-154 (exhausting indoors)	Moritz Mill (EU-154)	3.68		3.68	
C-156 (exhausting Stack S-156)	Iron Oxide Silo (EU-103)	1.19		1.19	
C-157 (exhausting Stack S-157)	Iron Oxide Silo (EU-105)	1.19		1.19	
C-158 (exhausting indoors)	Weigh Hopper (EU158)	1.55		1.55	
C-159 (exhausting indoors)	Weigh Hopper (EU-159)	1.55		1.55	
C-122 (Stack S-122)	Banbury Mixer (EU-122)	0.89		0.89	
	Twin Banbury/Extruder/Mixer Line (EU-123B)				

\*This is to provide operational flexibility if in case the source constructs one of 2 scrubbers at different time.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per 12 consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

**D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from each unit shall not exceed the following:

Emission Unit	Process Weight Rate (tons/hr)	PM Limitations (lb/hr)
Rotary Calcining Kiln (EU-101)	1.5	5.38
Rotary Calcining Kiln (EU-102)	1.75	5.97
Moritz Mill (EU-152)	0.85	3.68
Moritz Mill (EU-153)	0.85	3.68
Moritz Mill (EU-154)	0.85	3.68
Weigh Hopper (EU-156)	0.83	3.63
Weigh Hopper (EU-157)	0.83	3.63
Weigh Hopper (EU-158)	0.44	2.35
Cibec Mixer (EU123C)	1.59	5.59
Weigh Hopper (EU-159)	0.44	2.35
Cibec Mixer (EU125)	1.59	5.59
Banbury Mixer (EU-122)	1.85	6.19
Twin Banbury/Extruder/ Mixer Line (EU-123B)	1.50	5.38
Iron Oxide Silo (EU-103)	0.83	3.63
Iron Oxide Silo (EU-105)	0.83	3.63

These pounds per hour limitations were calculated using the following equation:

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

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

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

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

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

**D.1.5 Particulate Control**

- (a) In order to comply with Conditions D.1.1, D.1.2, and D.1.3, the wet scrubber(s) for particulate control shall be in operation and control emissions from the rotary calcining kilns, identified as EU-101 and EU-102, at all times that the associated kiln(s) is/are in operation.
- (b) In order to comply with Conditions D.1.1, D.1.2, and D.1.3, the baghouses for particulate control shall be in operation and control emissions from the following:

Baghouse	Emission Unit
C-152 (exhausting indoors)	Moritz Mill (EU-152)
C-153 (exhausting indoors)	Moritz Mill (EU-153)
C-154 (exhausting indoors)	Moritz Mill (EU-154)
C-156 (exhausting Stack S-156)	Iron Oxide Silo (EU-103)
C-157 (exhausting Stack S-157)	Iron Oxide Silo (EU-105)
C-158 (exhausting indoors)	Weigh Hopper (EU158)
C-159 (exhausting indoors)	Weigh Hopper (EU-159)

Baghouse	Emission Unit
C-122 (Stack S-122)	Banbury Mixer (EU-122)
	Twin Banbury/Extruder/Mixer Line (EU-123B)

at all times that these units are in operation.

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

**D.1.6 Testing Requirements [326 IAC 2-1.1-11]**

- (a) In order to demonstrate the compliance status with Conditions D.1.1, D.1.2, and D.1.3, not later than one hundred and eighty (180) days after initial startup of the Twin Banbury/Extruder/Mixer Line (EU-123B), the Permittee shall conduct PM, PM10, and PM2.5 testing for the Banbury Mixer (EU-122) and Twin Banbury/Extruder/Mixer Line (EU-123B), utilizing methods as approved by the Commissioner.

This test shall be repeated at least once every five (5) years from the date of the most recent valid demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligations with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

Baghouse C-122 is a common control device used for twin banbury/extruder/mixer line EU-123B and Banbury Mixer EU-122.

- (b) In order to demonstrate the compliance status with Conditions D.1.1, D.1.2, and D.1.3, not later than one hundred and eighty (180) days after initial startup of each rotary calcining kilns (EU-101 and EU-102), the Permittee shall conduct PM, PM10, and PM2.5 testing for each of the two rotary calcining kilns (EU-101 and EU-102) after its control, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligations with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

- (c) In order to demonstrate the compliance status with Conditions D.1.1, D.1.2, and D.1.3, not later than one hundred and eighty (180) days after initial startup of the following, the Permittee shall conduct PM, PM10, and PM2.5 testing:

Baghouse	Emission Unit
C-152 (exhausting indoors)	Moritz Mill (EU-152)
C-153 (exhausting indoors)	Moritz Mill (EU-153)
C-154 (exhausting indoors)	Moritz Mill (EU-154)
C-156 (exhausting Stack S-156)	Iron Oxide Silo (EU-103)
C-157 (exhausting Stack S-157)	Iron Oxide Silo (EU-105)
C-158 (exhausting indoors)	Weigh Hopper (EU158)
C-159 (exhausting indoors)	Weigh Hopper (EU-159)

Baghouse	Emission Unit
C-122 (Stack S-122)	Banbury Mixer (EU-122)
	Twin Banbury/Extruder/Mixer Line (EU-123B)

utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligations with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

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

**D.1.7 Visible Emissions Notations**

- 
- (a) Visible emission notations of the Rotary Kilns, and Banbury Mixer and Twin Banbury/Extruder/Mixer stack exhausts (S-101-2 and S-122) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
  - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
  - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
  - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
  - (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reporting required by this condition. Failure to take response steps shall be considered a deviation from this permit.

**D.1.8 Parametric Monitoring**

- 
- (a) The Permittee shall record the pressure drop across the baghouses used in conjunction with the following:

Baghouse	Emission Unit
C-152 (exhausting indoors)	Moritz Mill (EU-152)
C-153 (exhausting indoors)	Moritz Mill (EU-153)
C-154 (exhausting indoors)	Moritz Mill (EU-154)
C-156 (exhausting Stack S-156)	Iron Oxide Silo (EU-103)
C-157 (exhausting Stack S-157)	Iron Oxide Silo (EU-105)
C-158 (exhausting indoors)	Weigh Hopper (EU158)
C-159 (exhausting indoors)	Weigh Hopper (EU-159)
C-122 (Stack S-122)	Banbury Mixer (EU-122)
	Twin Banbury/Extruder/Mixer Line (EU-123B)

at least once per day when the process is in operation. When, for any one reading, the pressure drop across the baghouse is outside of the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.5 and 6.5 inches of water unless a different upper-bound or lower-bound value for this

range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

- (b) The Permittee shall record the pressure drop and flow rate across each scrubber used in conjunction with the rotary calcining kiln(s), at least once per day when the associated kiln(s) is/are in operation.

When for any one reading, the pressure drop across the scrubber is outside the normal range of 15 and 21 inches of water, or a range established during the latest stack test, the Permittee shall take reasonable response steps. Failure to take response steps shall be considered a deviation from this permit. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

When for any one reading, the flow rate of any of the scrubbers is less than the minimum of 55 gallons per minute, or a minimum established during the latest stack test, the Permittee shall take reasonable response steps. Failure to take response steps shall be considered a deviation from this permit. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

A pressure reading that is outside the above mention range or a flow rate that is below the above mentioned minimum is not a deviation from this permit, the Permittee shall take reasonable response steps. Failure to take response steps shall be considered a deviation from this permit. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

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

#### D.1.9 Broken or Failed Bag Detection

- (a) For a single compartment baghouses 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 have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the 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's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

**D.1.10 Scrubber Failure Detection**

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

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

**D.1.11 Record Keeping Requirements**

- (a) To document the compliance status with Condition D.1.7, the Permittee shall maintain records of daily visible emission notations of the Banbury mixer (EU-122) and the Twin Banbury/Extruder/Mixer Line (EU-123B) and Rotary Kilns (EU-101 and EU-102) stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) To document the compliance status with Condition D.1.8(a), the Permittee shall maintain records of the pressure drop on the baghouses used in conjunction with the following

Baghouse	Emission Unit
C-152 (exhausting indoors)	Moritz Mill (EU-152)
C-153 (exhausting indoors)	Moritz Mill (EU-153)
C-154 (exhausting indoors)	Moritz Mill (EU-154)
C-156 (exhausting Stack S-156)	Iron Oxide Silo (EU-103)
C-157 (exhausting Stack S-157)	Iron Oxide Silo (EU-105)
C-158 (exhausting indoors)	Weigh Hopper (EU158)
C-159 (exhausting indoors)	Weigh Hopper (EU-159)
C-122 (Stack S-122)	Banbury Mixer (EU-122)
	Twin Banbury/Extruder/Mixer Line (EU-123B)

during normal operation. The Permittee shall include in its daily record when a pressure drop or a flow rate reading is not taken and the reason for the lack of a pressure drop or flow rate reading, (e.g., the process did not operate that day).

- (c) To document the compliance status with Condition D.1.8(b), the Permittee shall maintain daily records of the following operational parameters for the scrubber associated with each rotary calcining kiln during normal operation:
  - (1) pressure drop; and
  - (2) flow rate.

The Permittee shall include in its daily record when a pressure drop or a flow rate reading is not taken and the reason for the lack of a pressure drop or flow rate reading (e.g., the process did not operate that day).

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

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

#### Insignificant Activities:

- (e) One (1) natural gas-fired Cleaver Brooks boiler, constructed in 1999, identified as EU-151, with a maximum heat input of 2.5 MMBtu per hour, exhausting to stack S-151.

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

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

#### D.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating: Emission limitations for facilities specified in 326 IAC 6-2-1(d)), the PM emissions from the Cleaver Brooks boiler shall not exceed 0.86 pound per million Btu heat input (lb/MMBtu). This limitation was calculated using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{Where } Q = \text{total source capacity (MMBtu/hr)}$$

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

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

Source Name: Ilpea Industries Inc.  
Source Address: 1320 S. Main Street, Scottsburg, Indiana 47170  
FESOP Permit No.: F143-32451-00018

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Ilpea Industries Inc.  
Source Address: 1320 S. Main Street, Scottsburg, Indiana 47170  
FESOP Permit No.: F143-32451-00018

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12.

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

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

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

Page 2 of 2

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

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

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

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

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

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

Source Name: Ilpea Industries Inc.  
Source Address: 1320 S. Main Street, Scottsburg, Indiana 47170  
FESOP Permit No.: F143-32451-00018

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

Page 1 of 2

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

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

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

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

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

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

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

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

**Source Description and Location**

<b>Source Name:</b>	<b>Ilpea Industries, Inc.</b>
<b>Source Location:</b>	<b>1320 South Main Street, Scottsburg, Indiana 47170</b>
<b>County:</b>	<b>Scott</b>
<b>SIC Code:</b>	<b>3053 (Gaskets, Packaging and Sealing Devices) 3399 (Primary Metal Products, n.e.c.)</b>
<b>Permit Renewal No.:</b>	<b>F143-32451-00018</b>
<b>Operation Permit Issuance Date:</b>	<b>August 5, 2013</b>
<b>Significant Permit Revision No.:</b>	<b>143-37097-00018</b>
<b>Permit Reviewer:</b>	<b>Brian Williams</b>

On April 19, 2016, the Office of Air Quality (OAQ) received an application from Ilpea Industries, Inc. related to a modification to an existing plastics and magnetic plastics manufacturing operation plant.

**Existing Approvals**

The source was issued FESOP Renewal No. F143-32451-00018, on August 5, 2013. The source has since received the following approvals:

- (a) Significant Permit Revision No. 143-34316-00018, issued on July 7, 2014;
- (b) Significant Permit Revision No. 143-35175-00018, issued on April 7, 2015; and
- (c) Review Request No. 143-37099-00018, issued on May 9, 2016.

**County Attainment Status**

The source is located in Scott County.

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

<sup>1</sup>Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Scott County has been designated as

attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

**Fugitive Emissions**

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

**Status of the Existing Source**

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

This PTE table is from the TSD or Appendix A of Significant Permit Revision No. 143-35175-00018, issued on April 7, 2015.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)										
	PM	PM10*	PM2.5**	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP		
Silo - EU-106	0.27	0.27	0.27	0.00	0.00	0.00	0.00	0.00	0.00		
Silo - EU-107	0.27	0.27	0.27	0.00	0.00	0.00	0.00	0.00	0.00		
Silo - EU-108	0.40	0.40	0.40	0.00	0.00	0.00	0.00	0.00	0.00		
Banbury Mixer- EU-122	2.63	2.63	2.63	0.00	0.00	0.00	0.00	0.00	0.00		
Twin Banbury/Extruder Mixer Line EU-123B											
Plastic Pellet Production Line - EU-112	0.07	0.07	0.07	0.00	0.00	0.66	0.00	0.00	0.00		
Plastic Pellet Production Line - EU-113	0.05	0.05	0.05	0.00	0.00	0.46	0.00	0.00	0.00		
Plastic Pellet Production Line - EU-114	0.13	0.13	0.13	0.00	0.00	1.18	0.00	0.00	0.00		
Plastic Pellet Production Line -EU-115	0.08	0.08	0.08	0.00	0.00	0.79	0.00	0.00	0.00		
Plastic Pellet Production Line -EU-116	0.08	0.08	0.08	0.00	0.00	0.79	0.00	0.00	0.00		
Plastic Pellet Production Line -EU-117	0.11	0.11	0.11	0.00	0.00	0.99	0.00	0.00	0.00		
Plastic Pellet Production Line -EU-118	0.11	0.11	0.11	0.00	0.00	0.99	0.00	0.00	0.00		
Plastic Pellet Production Line -EU-119	0.04	0.04	0.04	0.00	0.00	0.39	0.00	0.00	0.00		
Silo - EU-103	5.21	5.21	5.21	0.00	0.00	0.00	0.00	0.00	0.00		
Silo - EU-105	5.21	5.21	5.21	0.00	0.00	0.00	0.00	0.00	0.00		
Rotary Kilns-Process Emissions - EU-101 (wet scrubber)/S-101-2	23.56	49.71	4.16	9.02	4.16	9.02	0.00	0.00	0.00	0.76	0.71 HCl

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)											
	PM		PM10*		PM2.5**		SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Worst Single HAP
Rotary Kilns-Process Emissions - EU-102 (wet scrubber)/S-101-2	26.15		4.86		4.86		0.00	0.00	0.00	0.00	0.88	0.82 HCl
Moritz Mills - EU-152 and EU-153	32.24		32.24		32.24		0.00	0.00	0.00	0.00	0.00	0.00
Moritz Mill - EU-154	16.12		16.12		16.12		0.00	0.00	0.00	0.00	0.00	0.00
Weigh Hopper - EU158	18.83		6.79		6.79		0.00	0.00	0.00	0.00	0.00	0.00
Weigh Hopper - EU-159	18.83		6.79		6.79		0.00	0.00	0.00	0.00	0.00	0.00
Cibec Mixer EU123C	2.61		1.30		1.30		0.00	0.00	0.00	0.00	0.00	0.00
Cibec Mixer EU125	2.61		1.30		1.30		0.00	0.00	0.00	0.00	0.00	0.00
Rotary Kilns - Natural Gas Combustion -EU-101 and EU-102	0.16		0.65		0.65		0.05	8.59	0.47	7.21	0.16	0.15 Hexane
Natural Gas Combustion for heaters and boiler including: EU-119, EU-136, EU-141, EU-142, EU-143, EU-137, EU-138, EU-139, EU-140, EU-144, EU-145, EU-146, EU-147, EU-148, EU-149 and EU-151	0.06		0.23		0.23		0.02	2.99	0.16	2.51	0.06	0.05 Hexane
Plastic Extrusion Lines	0.00		0.00		0.00		0.00	0.00	0.99	0.00	0.00	0.00
Natural Gas Combustion for heaters including: EU170-173	0.01		0.05		0.05		0.00	0.69	0.04	0.58	0.01	0.01 (hexane)
<b>Total PTE of Entire Source</b>	<b>155.84</b>		<b>89.16</b>		<b>89.16</b>		<b>0.07</b>	<b>12.26</b>	<b>7.90</b>	<b>10.3</b>	<b>1.76</b>	<b>1.53 HCl</b>
Title V Major Source Thresholds	-		100		100		100	100	100	100	25	10
PSD Major Source Thresholds	250		250		250		250	250	250	250	-	-
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 <sub>2.5</sub> listed is direct PM <sub>2.5</sub> .												

- (a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no PSD regulated pollutant, is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

### Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Ilpea Industries, Inc. on April 19, 2016, relating to the following changes:

1. The existing plastic pellet production line (EU112) will be removed and replaced with a new larger plastic pellet production line. The new unit will have a maximum capacity of 3,500 pounds of plastic pellets per hour.
2. To notify IDEM that the source has removed one (1) existing plastic pellet production line (EU114). In addition, the source had notified IDEM that they do not intend to construct the one (1) plastic pellet production line (EU119).
3. The unlimited PTE for the two (2) cibec mixers (EU123C and EU125) currently assumes the each mixer will process five (5) batches per day. The source is now requesting to increase the number of batches per day to eight (8) per mixer.
4. The source has notified IDEM that the one (1) cibec mixer (EU125) has not yet been constructed.
5. The maximum capacity for the one (1) weigh hopper (EU157) is currently listed as 870 pounds per hour. However, the correct capacity is 40,000 pounds per day. This change will not increase the unlimited or limited potential to emit, since this weigh hopper vents to silo EU-105. In addition, the source has notified IDEM that EU157 has not yet been constructed.
6. The baghouse that controls the banbury mixer (EU-122) and twin banbury/extruder/mixer line (EU123B) will be modified to exhaust to the outdoors. These emission units are currently permitted to exhaust outdoors, but the source currently exhausts them to the indoors.
7. Upon further review, the source has determined that they provided the incorrect maximum capacity for the twin banbury/extruder/mixer line (EU123B), which was approved for construction in FESOP Renewal No. F143-32451-00018, on August 5, 2013. The maximum capacity of this unit is 3,000 pounds per hour not 660 pounds per hour. This unit was constructed in August of 2015. Due to the increase in maximum capacity the unlimited potential to emit PM, PM10, and PM2.5 increased. Additionally, the existing combined PM, PM10, and PM2.5 emission limits for the banbury mixer (EU-122) and twin banbury/extruder/mixer line (EU123B) will be increased due to this change in throughput.

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

#### Plastic Pellet Process

The plastic pellet process blends PVC, filler and color and extrudes the mixture into plastic pellets.

- (a) One (1) Banbury mixer, constructed in 1999, approved in 2016 to exhaust to the outdoors, identified as EU-122, with a maximum capacity of 3,700 lbs per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122.
- (b) One (1) plastic pellet production line, approved in 2016 for construction, identified as EU-112, with a maximum capacity of 3,500 pounds per hour, uncontrolled, and exhausting to wall vent 112.

This line will replace the plastic pellet production line, identified as EU-112 that was previously constructed in 1999 and had a maximum capacity of 1,000 pounds per hour.

## Powder Metal Process

- (c) One (1) weigh hopper, approved in 2013 for construction, approved in 2015 for modification to remove a baghouse, and approved in 2016 to correct the maximum capacity, identified as EU-157, with a maximum capacity of 40,000 lbs per day of iron oxide, venting to silo EU-105.

The maximum capacity for this unit was revised from 870 lbs per hour to 40,000 lbs per day. This emission unit has not been constructed.

- (d) One (1) Cibec Mixer, constructed in 2014, modified in 2015 to remove a baghouse and correct the maximum capacity, and approved in 2016 for modification to increase the maximum number of batches per day, identified as EU-123C, with a maximum capacity of 8,000 pounds of iron oxide, 1,360 lbs of strontium carbonate, 170 lbs of ferric chloride, per batch, eight (8) batches per day, using no control, and exhausting indoors.

The maximum number of batches per day increased from five (5) to eight (8).

- (e) One (1) Cibec Mixer, approved in 2014 for construction, approved in 2015 for modification to remove a baghouse and correct the maximum capacity, and approved in 2016 for modification to increase the maximum number of batches per day, identified as EU-125, with a maximum capacity of 8,000 pounds of iron oxide, 1,360 lbs of strontium carbonate, 170 lbs of ferric chloride, per batch, five (5) batches per day, using no control, and exhausting indoors.

The maximum number of batches per day increased from five (5) to eight (8). This emission unit has not been constructed.

- (f) One (1) twin banbury/extruder/mixer line, constructed in 2015, approved in 2016 to correct the maximum capacity, identified as EU-123B, with a maximum capacity of 3,000 pounds per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122, and consisting of the following:

- (1) One (1) 275- liter capacity mixer, and
- (2) Two (2) twin banbury extruders/mixers

The banbury mixes powder metal and plastic together to form a magnetic compound. Ingredients used are tin chloride-halogenated activator, textile mordant, antioxidant (coba, BAS, special chem 4polymers), stearic acid, black concentrate, process oil, PP melt flow 6, phenolic resin in mineral oil, 40% extended EPDM, rubee grade zinc oxide, talc from imerys.

The baghouse C-122 is a common control device used for twin banbury/extruder/mixer line EU-123B and Banbury Mixer EU-122.

This emission unit was approved in 2013 for construction and was constructed in August of 2015, but the source provided an incorrect maximum capacity for this unit. The source initially told IDEM that the maximum capacity was 660 pounds per hour.

The following is a list of the emission units that have been removed from the source:

- (a) One (1) plastic pellet production line, constructed in 1999, identified as EU-112, with a maximum capacity of 1,000 pounds per hour, no control and exhausting to stack S-112.
- (b) One (1) plastic pellet production line, constructed in 1999, identified as EU-114, with a maximum capacity of 1,800 pounds per hour, no control and exhausting to stack S-114.
- (c) One (1) plastic pellet production line, identified as EU-119, approved in 2013 for construction, maximum capacity of 600.00 pound per hour, no control and exhausting indoors.

This line was never constructed.

**Enforcement Issues**

IDEM is aware that there is a pending enforcement action for the failure to conduct stack testing. IDEM is reviewing this matter and will take the appropriate action.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – FESOP Revision**

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

Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Plastic Pellet Production Line (EU112)	0.25	0.25	0.25	0	0	2.30	0	0	0
Cibec Mixers (EU123C & EU125) - PTE Increase After Modification	3.13	1.57	1.57	0	0	0	0	0	0
Twin Banbury/Extruder /Mixer Line (EU-123B) - PTE Increase After Modification	133.24	133.24	133.24	0	0	0	0	0	0
<b>Total PTE of Proposed</b>	<b>136.61</b>	<b>135.06</b>	<b>135.06</b>	<b>0</b>	<b>0</b>	<b>2.30</b>	<b>0</b>	<b>0</b>	<b>0</b>

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

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

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

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

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

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)											
	PM	PM10*	PM2.5**	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP			
Silo - EU-106	0.27	0.27	0.27	0.00	0.00	0.00	0.00	0.00	0.00			
Silo - EU-107	0.27	0.27	0.27	0.00	0.00	0.00	0.00	0.00	0.00			
Silo - EU-108	0.40	0.40	0.40	0.00	0.00	0.00	0.00	0.00	0.00			
Banbury Mixer- EU-122	<del>2.63</del> <b>3.88</b>		<del>2.63</del> <b>3.88</b>		<del>2.63</del> <b>3.88</b>		0.00	0.00	0.00	0.00	0.00	
Twin Banbury/Extruder Mixer Line EU-123B							0.00	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-112	<del>0.07</del> <b>0.25</b>	<del>0.07</del> <b>0.25</b>	<del>0.07</del> <b>0.25</b>	0.00	0.00	<del>0.66</del> <b>2.30</b>	0.00	0.00	0.00			
Plastic Pellet Production Line - EU-113	0.05	0.05	0.05	0.00	0.00	0.46	0.00	0.00	0.00			
Plastic Pellet Production Line - EU-114	<del>0.13</del>	<del>0.13</del>	<del>0.13</del>	<del>0.00</del>	<del>0.00</del>	<del>1.18</del>	<del>0.00</del>	<del>0.00</del>	<del>0.00</del>			
Plastic Pellet Production Line -EU-115	0.08	0.08	0.08	0.00	0.00	0.79	0.00	0.00	0.00			
Plastic Pellet Production Line -EU-116	0.08	0.08	0.08	0.00	0.00	0.79	0.00	0.00	0.00			
Plastic Pellet Production Line -EU-117	0.11	0.11	0.11	0.00	0.00	0.99	0.00	0.00	0.00			
Plastic Pellet Production Line -EU-118	0.11	0.11	0.11	0.00	0.00	0.99	0.00	0.00	0.00			
Plastic Pellet Production Line -EU-119	<del>0.04</del>	<del>0.04</del>	<del>0.04</del>	<del>0.00</del>	<del>0.00</del>	<del>0.39</del>	<del>0.00</del>	<del>0.00</del>	<del>0.00</del>			
Silo - EU-103	5.21	5.21	5.21	0.00	0.00	0.00	0.00	0.00	0.00			
Silo - EU-105	5.21	5.21	5.21	0.00	0.00	0.00	0.00	0.00	0.00			
Rotary Kilns-Process Emissions - EU-101 (wet scrubber)/S-101-2	23.56	49.71	4.16	9.02	4.16	9.02	0.00	0.00	0.00	0.00	0.76	0.71 HCl
Rotary Kilns-Process Emissions - EU-102 (wet scrubber)/S-101-2	26.15		4.86		4.86		0.00	0.00	0.00	0.00	0.88	0.82 HCl
Moritz Mills - EU-152 and EU-153	32.24	32.24	32.24	0.00	0.00	0.00	0.00	0.00	0.00			
Moritz Mill - EU-154	16.12	16.12	16.12	0.00	0.00	0.00	0.00	0.00	0.00			
Weigh Hopper - EU158	18.83	6.79	6.79	0.00	0.00	0.00	0.00	0.00	0.00			
Weigh Hopper - EU-159	18.83	6.79	6.79	0.00	0.00	0.00	0.00	0.00	0.00			
Cibec Mixer EU123C	<del>2.64</del> <b>4.17</b>	<del>1.30</del> <b>2.09</b>	<del>1.30</del> <b>2.09</b>	0.00	0.00	0.00	0.00	0.00	0.00			
Cibec Mixer EU125	<del>2.64</del> <b>4.17</b>	<del>1.30</del> <b>2.09</b>	<del>1.30</del> <b>2.09</b>	0.00	0.00	0.00	0.00	0.00	0.00			
Rotary Kilns - Natural Gas Combustion -EU-101 and EU-102	0.16	0.65	0.65	0.05	8.59	0.47	7.21	0.16	0.15 Hexane			

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM	PM10*	PM2.5**	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Worst Single HAP
Natural Gas Combustion for heaters and boiler including: EU-119, EU-136, EU-141, EU-142, EU-143, EU-137, EU-138, EU-139, EU-140, EU-144, EU-145, EU-146, EU-147, EU-148, EU-149 and EU-151	0.06	0.23	0.23	0.02	2.99	0.16	2.51	0.06	0.05 Hexane
Plastic Extrusion Lines	0.00	0.00	0.00	0.00	0.00	0.99	0.00	0.00	0.00
Natural Gas Combustion for heaters including: EU170-173	0.01	0.05	0.05	0.00	0.69	0.04	0.58	0.01	0.01 (hexane)
Total PTE of Entire Source	<del>155.84</del> <b>160.23</b>	<del>89.16</del> <b>91.98</b>	<del>89.16</del> <b>91.98</b>	0.07	12.26	<del>7.90</del> <b>7.97</b>	10.3	1.76	1.53 HCl
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-
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 <sub>2.5</sub> listed is direct PM <sub>2.5</sub> .									

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

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)										
	PM	PM10*	PM2.5**	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Worst Single HAP		
Silo - EU-106	0.27	0.27	0.27	0.00	0.00	0.00	0.00	0.00	0.00		
Silo - EU-107	0.27	0.27	0.27	0.00	0.00	0.00	0.00	0.00	0.00		
Silo - EU-108	0.40	0.40	0.40	0.00	0.00	0.00	0.00	0.00	0.00		
Banbury Mixer- EU-122											
Twin Banbury/Extruder Mixer Line EU-123B	3.88	3.88	3.88	0.00	0.00	0.00	0.00	0.00	0.00		
Plastic Pellet Production Line - EU-112	0.25	0.25	0.25	0.00	0.00	2.30	0.00	0.00	0.00		
Plastic Pellet Production Line - EU-113	0.05	0.05	0.05	0.00	0.00	0.46	0.00	0.00	0.00		
Plastic Pellet Production Line -EU-115	0.08	0.08	0.08	0.00	0.00	0.79	0.00	0.00	0.00		
Plastic Pellet Production Line -EU-116	0.08	0.08	0.08	0.00	0.00	0.79	0.00	0.00	0.00		
Plastic Pellet Production Line -EU-117	0.11	0.11	0.11	0.00	0.00	0.99	0.00	0.00	0.00		
Plastic Pellet Production Line -EU-118	0.11	0.11	0.11	0.00	0.00	0.99	0.00	0.00	0.00		
Silo - EU-103	5.21	5.21	5.21	0.00	0.00	0.00	0.00	0.00	0.00		
Silo - EU-105	5.21	5.21	5.21	0.00	0.00	0.00	0.00	0.00	0.00		
Rotary Kilns-Process Emissions - EU-101 (wet scrubber)/S-101-2	23.56	49.71	4.16	9.02	4.16	9.02	0.00	0.00	0.00	0.76	0.71 HCl
Rotary Kilns-Process Emissions - EU-102 (wet scrubber)/S-101-2	26.15		4.86		4.86		0.00	0.00	0.00	0.00	0.88

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM	PM10*	PM2.5**	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Moritz Mills - EU-152 and EU-153	32.24	32.24	32.24	0.00	0.00	0.00	0.00	0.00	0.00
Moritz Mill - EU-154	16.12	16.12	16.12	0.00	0.00	0.00	0.00	0.00	0.00
Weigh Hopper - EU158	18.83	6.79	6.79	0.00	0.00	0.00	0.00	0.00	0.00
Weigh Hopper - EU-159	18.83	6.79	6.79	0.00	0.00	0.00	0.00	0.00	0.00
Cibec Mixer EU123C	4.17	2.09	2.09	0.00	0.00	0.00	0.00	0.00	0.00
Cibec Mixer EU125	4.17	2.09	2.09	0.00	0.00	0.00	0.00	0.00	0.00
Rotary Kilns - Natural Gas Combustion -EU-101 and EU-102	0.16	0.65	0.65	0.05	8.59	0.47	7.21	0.16	0.15 Hexane
Natural Gas Combustion for heaters and boiler including: EU-119, EU-136, EU-141, EU-142, EU-143, EU-137, EU-138, EU-139, EU-140, EU-144, EU-145, EU-146, EU-147, EU-148, EU-149 and EU-151	0.06	0.23	0.23	0.02	2.99	0.16	2.51	0.06	0.05 Hexane
Plastic Extrusion Lines	0.00	0.00	0.00	0.00	0.00	0.99	0.00	0.00	0.00
Natural Gas Combustion for heaters including: EU170-173	0.01	0.05	0.05	0.00	0.69	0.04	0.58	0.01	0.01 (hexane)
<b>Total PTE of Entire Source</b>	<b>160.23</b>	<b>91.98</b>	<b>91.98</b>	<b>0.07</b>	<b>12.26</b>	<b>7.97</b>	<b>10.3</b>	<b>1.76</b>	<b>1.53 HCl</b>
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-
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 <sub>2.5</sub> listed is direct PM <sub>2.5</sub> .									

(a) FESOP Status

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

Criteria Pollutants

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) The PM10 and PM2.5 emissions after control from the emission units identified in the table below shall not exceed the following:

Control Device	Emission Units	PM10 Limitation (lb/hr)	PM2.5 Limitation (lb/hr)
C-122 (Stack S-122)	Banbury Mixer (EU-122)	0.89	0.89
	Twin Banbury/Extruder/Mixer Line (EU-123B)		

The PM10 and PM2.5 limitations have been increased from 0.60 pounds per hour to 0.89 pounds per hour, due to this modification. This is a Title 1 change.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, *each* and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(b) PSD Minor Source – PM

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

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

- (1) The PM emissions after control from the emission units identified in the table below shall not exceed the following:

Control Device	Emission Units	PM Limitation (lb/hr)
C-122 (Stack S-122)	Banbury Mixer (EU-122)	0.89
	Twin Banbury/Extruder/Mixer Line (EU-123B)	

The PM limitation has been increased from 0.60 pounds per hour to 0.89 pounds per hour, due to this modification. This is a Title 1 change.

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

**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 proposed revision.

(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 proposed revision.

(c) Compliance Assurance Monitoring (CAM)

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

**State Rule Applicability Determination**

- (a) **326 IAC 2-8-4 (FESOP)**  
 This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) **326 IAC 2-2 (Prevention of Significant Deterioration (PSD))**  
 This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) **326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**  
 The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new and modified emission units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (d) **326 IAC 2-6 (Emission Reporting)**  
 Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) **326 IAC 5-1 (Opacity Limitations)**  
 Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) 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.
  - (2) 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.

Plastic Pellet Production Line (EU112), Cibec Mixers (EU123C & EU125), Weigh Hopper (EU157), & Twin Banbury/Extruder/Mixer Line (EU-123B)

- (a) **326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**
  - (1) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each emission unit shall not exceed the following pounds per hour limitation when operating at the following process weight rate:

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions (lb/hr)
Cibec Mixer (EU123C)	1.59	5.59
Cibec Mixer (EU125)	1.59	5.59
Weigh Hopper (EU157)	0.83	3.63
Twin Banbury/Extruder/Mixer Line (EU-123B)	1.50	5.38

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:

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

Based on calculations, a control device is not needed for the two (2) cibec mixers (EU123C and EU125) to comply with these limits.

The control equipment shall be in operation at all times the weigh hopper (EU157) and Twin Banbury/Extruder/Mixer Line (EU-123B) are in operation, in order to comply with these limits.

- (2) Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour are exempt from the requirements of 326 IAC 6-3-2. The plastic pellet production line (EU112) has potential particulate matter emission of six tenths (0.6) pounds per hour. Therefore, this line is not subject to the requirements of 326 IAC 6-3-2.
- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
 The plastic pellet production line (EU112) is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from this line is less than twenty-five (25) tons per year. The cibec mixers (EU123C & EU125), weigh hopper (EU157), and twin banbury/extruder/mixer line (EU-123B) are not subject to the requirements of 326 IAC 8-1-6, because these emission units do not emit VOCs.
- (c) There are no other 326 IAC 8 Rules that are applicable to these emission units.

**Compliance Determination, Monitoring and Testing Requirements**

- (a) The existing compliance determination and monitoring requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP Renewal No. F143-32451-00018, issued on August 5, 2013.
- (b) The testing requirements applicable to this proposed revision are as follows:

<b>Testing Requirements</b>				
<b>Emission Unit</b>	<b>Control Device</b>	<b>Pollutant</b>	<b>Timeframe for Testing</b>	<b>Frequency of Testing</b>
Banbury Mixer (EU-122) and Twin Banbury/Extruder/Mixer Line (EU-123B)	Baghouse C-122	PM, PM10, and PM2.5	One hundred eighty (180) days after initial startup of EU123B	Once every five (5) years

This existing testing is required in order to demonstrate compliance with 326 IAC 2-2 (PSD), 326 IAC 2-8-4 (FESOP), and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). The source should have performed this testing no later than 180 days after initial startup of Twin Banbury/Extruder/Mixer Line (EU-123B) as specified in Conditions D.1.6(a) and D.1.6(c). Instead the source only performed testing on the Banbury Mixer (EU-122) in April of 2015. However, the Banbury Mixer (EU-122) and Twin Banbury/Extruder/Mixer Line (EU-123B) have a common control and have combined PM, PM10, and PM2.5 emission limits. Therefore, both emission units must be in operation in order to demonstrate compliance with these limits.

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

- (1) The descriptive information in Sections A.2 and D.1 have been revised to reflect the changes requested by the source.
- (2) The PSD minor limit in Condition D.1.1 for the banbury mixer (EU-122) and twin banbury/extruder/mixer line (EU123B) has been revised due to this modification.
- (3) The FESOP and PSD minor limit in Condition D.1.2 for the banbury mixer (EU-122) and twin banbury/extruder/mixer line (EU123B) has been revised due to this modification.
- (4) The 326 IAC 6-3-2 allowable PM emission limits in Condition D.1.3 have been revised due to the changes in maximum capacities.
- (5) Condition D.1.6 has been revised to remove a duplicate statement.

...

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

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The source consists of the following permitted emission units:

Plastic Pellet Process

The plastic pellet process blends PVC, filler and color and extrudes the mixture into plastic pellets.

...

- (b) One (1) Banbury mixer, constructed in 1999, **approved in 2016 for modification to exhaust to the outdoors**, identified as EU-122, with a maximum capacity of 3,700 lbs per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122.
- ~~(c) One (1) plastic pellet production line, constructed in 1999, identified as EU-112, with a maximum capacity of 1,000 pounds per hour, no control and exhausting to stack S-112.~~
- (c) One (1) plastic pellet production line, approved in 2016 for construction, identified as EU-112, with a maximum capacity of 3,500 pounds per hour, uncontrolled, and exhausting to wall vent 112.**
- ...
- ~~(e) One (1) plastic pellet production line, constructed in 1999, identified as EU-114, with a maximum capacity of 1,800 pounds per hour, no control and exhausting to stack S-114.~~
- ~~(fe)~~ One (1) plastic pellet production line, constructed in 1999, identified as EU-115, with a maximum capacity of 1,200 pounds per hour, no control and exhausting indoors.
- ~~(gf)~~ One (1) plastic pellet production line, constructed in 1999, identified as EU-116, with a maximum capacity of 1,200 pounds per hour, no control and exhausting to stack S-116.
- ~~(hg)~~ One (1) plastic pellet production line, constructed in 1999, identified as EU-117, with a maximum capacity of 1,500 pounds per hour, no control and exhausting indoors.
- ~~(ih)~~ One (1) plastic pellet production line, constructed in 1999, identified as EU-118, with a maximum capacity of 1,500 pounds per hour, no control and exhausting indoors.
- ~~(j) One (1) plastic pellet production line, identified as EU-119, approved in 2013 for construction, maximum capacity of 600.00 pound per hour, no control and exhausting indoors.~~

## Powder Metal Process

- (ki) One (1) iron oxide silo, constructed in 2014, identified as EU-103, with a maximum throughput capacity of 20 tons per day, for the unloading of iron oxide powder, using baghouse C-156 for control, and exhausting to stack S-156.
- (lj) One (1) iron oxide silo, constructed in 2014, identified as EU-105, with a maximum throughput capacity of 20 tons per day, for the unloading of iron oxide powder, using baghouse C-157 for control, and exhausting to stack S-157.
- (~~mk~~) One (1) weigh hopper, constructed in 2014, and approved in 2015 for modification, identified as EU-156, with a maximum capacity of 40,000 lbs per day of iron oxide, venting to silo EU-103.
- (nl) One (1) weigh hopper, approved in 2013 for construction, ~~and approved in 2015 for modification~~ **to remove a baghouse, and approved in 2016 to correct the maximum capacity**, identified as EU-157, with a maximum capacity of ~~870 lbs per hour,~~ **40,000 lbs per day of iron oxide**, venting to silo EU-105.
- (~~em~~) One (1) Cibec Mixer, constructed in 2014, ~~and approved modified in 2015 for modification~~ **to remove a baghouse and correct the maximum capacity, and approved in 2016 for modification to increase the maximum number of batches per day**, identified as EU-123C, with a maximum capacity of 8,000 pounds of iron oxide, 1,360 lbs of strontium carbonate, 170 lbs of ferric chloride, per batch, ~~five eight (58)~~ **batches per day**, using no control, and exhausting indoors.
- (~~pn~~) One (1) Cibec Mixer, approved in 2014 for construction, ~~and approved in 2015 for modification~~ **to remove a baghouse and correct the maximum capacity, and approved in 2016 for modification to increase the maximum number of batches per day**, identified as EU-125, with a maximum capacity of 8,000 pounds of iron oxide, 1,360 lbs of strontium carbonate, 170 lbs of ferric chloride, per batch, ~~five eight (58)~~ **batches per day**, using no control, and exhausting indoors.
- (~~eo~~) One (1) weigh hopper, ~~approved constructed in 2014 for construction~~, identified as EU-158, with a maximum capacity of 870 pounds of Strontium Carbonate per hour, using a baghouse for control, identified as C-158, and exhausting indoors.
- (~~fp~~) One (1) weigh hopper, approved in 2014 for construction, identified as EU-159, with a maximum capacity of 870 pounds of Strontium Carbonate per hour, using a baghouse for control, identified as C-159, and exhausting indoors.
- (~~sq~~) One (1) rotary calcining kiln, ~~approved in 2013 for construction~~ **constructed in 2014**, identified as EU-101, with a maximum capacity of 3,000 lbs of iron oxide per hour, using a wet scrubber (identified as C-101-2) as control, and exhausting to stack S-101-2.
- (~~tr~~) One (1) rotary calcining kiln, approved in 2013 for construction, identified as EU-102, with a maximum capacity of 3,500 lbs of iron oxide per hour, using a wet scrubber (identified as C-102-2) as control, and exhausting to stack S-101-2.

Iron Oxide (from silos) and Strontium Carbonate (bags) are fed into the kilns and heated to form iron clinkers. The clinkers are milled from large particle size to a very fine powder which is used to make magnetic plastic. The milled material is sent to the Banbury mixer so plastic material can be added to form a compound and extruded to form magnetic plastic strips and rolls for plastic magnets.

Each above item (~~p q~~ and ~~q r~~) is served by its own scrubber, but they are exhausting to the same stack S-101-2.

- (~~us~~) One (1) Moritz Mill, ~~approved in 2013 for construction~~ **constructed in 2014**, identified as EU-152, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-152, and exhausting indoors.
- (~~vt~~) One (1) Moritz Mill, ~~approved in 2013 for construction~~ **constructed in 2014**, identified as EU-153, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-153, and exhausting indoors.
- (~~wu~~) One (1) Moritz Mill, approved in 2013 for construction, approved in 2014 for modification, identified as EU-154, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-154, and exhausting indoors.

The above unit was approved in 2013 for construction, but the maximum capacity was revised from 2,380 lbs per hour to 1,700 lbs per hour in 2014.

- (~~xv~~) One (1) twin banbury/extruder/mixer line, ~~approved in 2013 for construction~~ **constructed in 2013, approved in 2016 to correct the maximum capacity**, identified as EU-123B, with a maximum capacity of ~~660~~ **3,000** pounds per hour, using a baghouse for control, identified as C-122, **exhausting to stack S-122, and** consisting of the following:

...

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plastic Pellet Process

The plastic pellet process blends PVC, filler and color and extrudes the mixture into plastic pellets.

...

- (b) One (1) Banbury mixer, constructed in 1999, **approved in 2016 for modification to exhaust to the outdoors**, identified as EU-122, with a maximum capacity of 3,700 lbs per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122.

- ~~(c) One (1) plastic pellet production line, constructed in 1999, identified as EU-112, with a maximum capacity of 1,000 pounds per hour, no control and exhausting to stack S-112.~~

- (c) **One (1) plastic pellet production line, approved in 2016 for construction, identified as EU-112, with a maximum capacity of 3,500 pounds per hour, uncontrolled, and exhausting to wall vent 112.**

...

- ~~(e) One (1) plastic pellet production line, constructed in 1999, identified as EU-114, with a maximum capacity of 1,800 pounds per hour, no control and exhausting to stack S-114.~~

- (~~fe~~) One (1) plastic pellet production line, constructed in 1999, identified as EU-115, with a maximum capacity of 1,200 pounds per hour, no control and exhausting indoors.

- (~~gf~~) One (1) plastic pellet production line, constructed in 1999, identified as EU-116, with a maximum capacity of 1,200 pounds per hour, no control and exhausting to stack S-116.

- (~~hg~~) One (1) plastic pellet production line, constructed in 1999, identified as EU-117, with a

maximum capacity of 1,500 pounds per hour, no control and exhausting indoors.

- (ih) One (1) plastic pellet production line, constructed in 1999, identified as EU-118, with a maximum capacity of 1,500 pounds per hour, no control and exhausting indoors.
- ~~(j) One (1) plastic pellet production line, identified as EU-119, approved in 2013 for construction, maximum capacity of 600.00 pound per hour, no control and exhausting indoors.~~

#### Powder Metal Process

- (ki) One (1) iron oxide silo, constructed in 2014, identified as EU-103, with a maximum throughput capacity of 20 tons per day, for the unloading of iron oxide powder, using baghouse C-156 for control, and exhausting to stack S-156.
- (lj) One (1) iron oxide silo, constructed in 2014, identified as EU-105, with a maximum throughput capacity of 20 tons per day, for the unloading of iron oxide powder, using baghouse C-157 for control, and exhausting to stack S-157.
- (mk) One (1) weigh hopper, constructed in 2014, and approved in 2015 for modification, identified as EU-156, with a maximum capacity of 40,000 lbs per day of iron oxide, venting to silo EU-103.
- (nl) One (1) weigh hopper, approved in 2013 for construction, ~~and approved in 2015 for modification~~ **to remove a baghouse, and approved in 2016 to correct the maximum capacity**, identified as EU-157, with a maximum capacity of ~~870 lbs per hour,~~ **40,000 lbs per day of iron oxide**, venting to silo EU-105.
- (om) One (1) Cibec Mixer, constructed in 2014, ~~and approved modified in 2015 for modification~~ **to remove a baghouse and correct the maximum capacity, and approved in 2016 for modification to increase the maximum number of batches per day**, identified as EU-123C, with a maximum capacity of 8,000 pounds of iron oxide, 1,360 lbs of strontium carbonate, 170 lbs of ferric chloride, per batch, ~~five eight (58)~~ **eight (8)** batches per day, using no control, and exhausting indoors.
- (pn) One (1) Cibec Mixer, approved in 2014 for construction, ~~and approved in 2015 for modification~~ **to remove a baghouse and correct the maximum capacity, and approved in 2016 for modification to increase the maximum number of batches per day**, identified as EU-125, with a maximum capacity of 8,000 pounds of iron oxide, 1,360 lbs of strontium carbonate, 170 lbs of ferric chloride, per batch, ~~five eight (58)~~ **eight (8)** batches per day, using no control, and exhausting indoors.
- (qo) One (1) weigh hopper, ~~approved~~ **constructed** in 2014 ~~for construction~~, identified as EU-158, with a maximum capacity of 870 pounds of Strontium Carbonate per hour, using a baghouse for control, identified as C-158, and exhausting indoors.
- (rp) One (1) weigh hopper, approved in 2014 for construction, identified as EU-159, with a maximum capacity of 870 pounds of Strontium Carbonate per hour, using a baghouse for control, identified as C-159, and exhausting indoors.
- (sq) One (1) rotary calcining kiln, ~~approved in 2013 for construction~~ **constructed in 2014**, identified as EU-101, with a maximum capacity of 3,000 lbs of iron oxide per hour, using a wet scrubber (identified as C-101-2) as control, and exhausting to stack S-101-2.
- (tr) One (1) rotary calcining kiln, approved in 2013 for construction, identified as EU-102,

with a maximum capacity of 3,500 lbs of iron oxide per hour, using a wet scrubber (identified as C-102-2) as control, and exhausting to stack S-101-2.

Iron Oxide (from silos) and Strontium Carbonate (bags) are fed into the kilns and heated to form iron klinkers. The klinkers are milled from large particle size to a very fine powder which is used to make magnetic plastic. The milled material is sent to the Banbury mixer so plastic material can be added to form a compound and extruded to form magnetic plastic strips and rolls for plastic magnets.

Each above item (~~p q~~ and ~~q r~~) is served by its own scrubber, but they are exhausting to the same stack S-101-2.

(~~us~~) One (1) Moritz Mill, ~~approved in 2013 for construction~~ **constructed in 2014**, identified as EU-152, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-152, and exhausting indoors.

(~~vt~~) One (1) Moritz Mill, ~~approved in 2013 for construction~~ **constructed in 2014**, identified as EU-153, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-153, and exhausting indoors.

(~~wu~~) One (1) Moritz Mill, approved in 2013 for construction, approved in 2014 for modification, identified as EU-154, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-154, and exhausting indoors.

The above unit was approved in 2013 for construction, but the maximum capacity was revised from 2,380 lbs per hour to 1,700 lbs per hour in 2014.

(~~xv~~) One (1) twin banbury/extruder/mixer line, ~~approved in 2013 for construction~~ **constructed in 2013, approved in 2016 to correct the maximum capacity**, identified as EU-123B, with a maximum capacity of ~~660~~ **3,000** pounds per hour, using a baghouse for control, identified as C-122, **exhausting to stack S-122, and** consisting of the following:

...

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

D.1.1 PM PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (**PSD**) not applicable, the PM emissions after control from each unit shall not exceed the following:

Control Device	Emission Units	PM Limitations (lb/hr)
...	...	...
C-122 (Stack S-122)	Banbury Mixer (EU-122)	0.60 <b>0.89</b>
	Twin Banbury/Extruder/Mixer Line (EU-123B)	

...  
 D.1.2 Particulate Matter Less Than 10 Microns (PM10) and PM2.5 [326 IAC 2-2][326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (**FESOP**), and in order to render the requirements of 326 IAC 2-2 (**PSD**) not applicable, the PM10 and PM2.5 emissions after control from each unit shall not exceed the following:

Control Device	Emission Units	PM10 Limitations (lb/hr)	PM2.5 Limitations (lb/hr)
...	...	...	...
C-122 (Stack S-122)	Banbury Mixer (EU-122)	<del>0.60</del> <b>0.89</b>	<del>0.60</del> <b>0.89</b>
	Twin Banbury/Extruder/Mixer Line (EU-123B)		

...  
 D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from each unit shall not exceed the following:

Emission Unit	Process Weight Rate (tons/hr)	PM Limitations (lb/hr)
...	...	...
Weigh Hopper (EU-157)	<del>0.44</del> <b>0.83</b>	<del>2.35</del> <b>3.63</b>
Weigh Hopper (EU-158)	0.44	2.35
Cibec Mixer (EU123C)	<del>0.99</del> <b>1.59</b>	<del>4.08</del> <b>5.59</b>
Weigh Hopper (EU-159)	0.44	2.35
Cibec Mixer (EU125)	<del>0.99</del> <b>1.59</b>	<del>4.08</del> <b>5.59</b>
Banbury Mixer (EU-122)	1.85	6.19
Twin Banbury/Extruder/ Mixer Line (EU-123B)	<del>0.33</del> <b>1.50</b>	<del>1.95</del> <b>5.38</b>
Iron Oxide Silo (EU-103)	0.83	3.63
Iron Oxide Silo (EU-105)	0.83	3.63

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

...  
 D.1.6 Testing Requirements [326 IAC 2-1.1-11]

- (a) In order to demonstrate the compliance status with Conditions D.1.1, D.1.2, and D.1.3, not later than one hundred and eighty (180) days after initial startup of the Twin Banbury/Extruder/Mixer Line (EU-123B), the Permittee shall conduct PM, PM10, and PM2.5 testing for the Banbury Mixer (EU-122) and Twin Banbury/Extruder/Mixer Line (EU-123B), utilizing methods as approved by the Commissioner.

This test shall be repeated at least once every five (5) years from the date of the most recent valid demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligations with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.  
~~PM10 and PM2.5 includes filterable and condensable PM.~~

Baghouse C-122 is a common control device used for twin banbury/extruder/mixer line EU-123B and Banbury Mixer EU-122.

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

...

### **Additional Changes**

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

- (1) IDEM added the rule citation 326 IAC 2-8-4(1) to the Compliance Determination Requirements subsection title in Section D. 1 to clarify the authority of these conditions (see above for bold and strikeout).
  - (2) 326 IAC 2-8-12 states that the Permittee must notify IDEM within "four (4) daytime business hours" for emergencies. The FESOP Emergency Occurrence Report Form lacked the word 'daytime'. 'Daytime' is being added to be consistent with the rule. In addition, the existing rule citation is being corrected to refer to the FESOP rules.
- ...
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) **daytime** business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC **2-8-12. 2-7-16**

### **Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on April 19, 2016. Additional information was received on May 5, 2016.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 143-37097-00018. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Brian Williams at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5375 or toll free at 1-800-451-6027 extension 4-5375.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations  
Modification Summary**

Source Name: Ilpea Industries, Inc.  
Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170  
Permit Number: 143-37097-00018  
Permit Reviewer: Brian Williams

Unlimited PTE of New Emission Units (tons/year)									
Process	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Plastic Pellet Production Line (EU112)	0.25	0.25	0.25	0	0	2.30	0	0	0
<b>Total</b>	<b>0.25</b>	<b>0.25</b>	<b>0.25</b>	<b>0</b>	<b>0</b>	<b>2.30</b>	<b>0</b>	<b>0</b>	<b>0</b>

Unlimited PTE Before Modification (tons/year)									
Process	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Cibec Mixers (EU123C and EU125)	5.22	2.60	2.60	0	0	0	0	0	0
Twin Banbury/Extruder/Mixer Line (EU-123B)	37.58	37.58	37.58	0	0	0	0	0	0
<b>Total</b>	<b>42.80</b>	<b>40.18</b>	<b>40.18</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

Unlimited PTE After Modification (tons/year)									
Process	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Cibec Mixers (EU123C and EU125)	8.35	4.17	4.17	0	0	0	0	0	0
Twin Banbury/Extruder/Mixer Line (EU-123B)	170.82	170.82	170.82	0	0	0	0	0	0
<b>Total</b>	<b>179.17</b>	<b>174.99</b>	<b>174.99</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

Net PTE Increase of Modified Units (tons/year)									
Process	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Cibec Mixers (EU123C and EU125)	3.13	1.57	1.57	0	0	0	0	0	0
Twin Banbury/Extruder/Mixer Line (EU-123B)	133.24	133.24	133.24	0	0	0	0	0	0
<b>Net PTE Increase of Modified Units (tons/year)</b>	<b>136.37</b>	<b>134.81</b>	<b>134.81</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP
<b>Total PTE for New and Modified Units (tons/year)</b>	<b>136.61</b>	<b>135.06</b>	<b>135.06</b>	<b>0</b>	<b>0</b>	<b>2.30</b>	<b>0</b>	<b>0</b>	<b>0</b>

**Methodology**

Net PTE Increase of Modified Units (tons/year) = PTE After Modification - PTE Before Modification

Total PTE for New and Modified Units (tons/year) = Unlimited PTE of New Emissions Units + Net PTE Increase of Modified Units

**Appendix A: Emissions Calculations  
Summary**

Source Name: Ilpea Industries, Inc.  
Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170  
Permit Number: 143-37097-00018  
Permit Reviewer: Brian Williams

Unlimited PTE (tons/year)										
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAPs	Worst Single HAP
Rotary Kilns-Process Emissions - EU-101	854.10	854.10	854.10	0.00	0.00	0.00	0.00	0.71	0.71	HCl
Rotary Kilns-Process Emissions - EU-102	996.45	996.45	996.45	0.00	0.00	0.00	0.00	0.82	0.82	HCl
Silo - EU-103	67.82	67.82	67.82	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-105	67.82	67.82	67.82	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-106	0.27	0.27	0.27	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-107	0.27	0.27	0.27	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-108	0.40	0.40	0.40	0.00	0.00	0.00	0.00	0.00	0.00	
Moritz Mills - EU-152	109.50	109.50	109.50	0.00	0.00	0.00	0.00	0.00	0.00	
Moritz Mills - EU-153	109.50	109.50	109.50	0.00	0.00	0.00	0.00	0.00	0.00	
Moritz Mill - EU-154	109.50	109.50	109.50	0.00	0.00	0.00	0.00	0.00	0.00	
Weigh Hopper - EU-156	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Weigh Hopper - EU-157	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Weigh Hopper - EU158	113.88	113.88	113.88	0.00	0.00	0.00	0.00	0.00	0.00	
Weigh Hopper - EU-159	113.88	113.88	113.88	0.00	0.00	0.00	0.00	0.00	0.00	
Cybec Mixer EU123C	4.17	2.09	2.09	0.00	0.00	0.00	0.00	0.00	0.00	
Cybec Mixer EU125	4.17	2.09	2.09	0.00	0.00	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-112	0.25	0.25	0.25	0.00	0.00	2.30	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-113	0.05	0.05	0.05	0.00	0.00	0.46	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-115	0.08	0.08	0.08	0.00	0.00	0.79	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-116	0.08	0.08	0.08	0.00	0.00	0.79	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-117	0.11	0.11	0.11	0.00	0.00	0.99	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-118	0.11	0.11	0.11	0.00	0.00	0.99	0.00	0.00	0.00	
Banbury Mixer- EU-122	210.68	210.68	210.68	0.00	0.00	0.00	0.00	0.00	0.00	
Twin Banbury/Extruder Mixer Line - EU-123B	170.82	170.82	170.82	0.00	0.00	0.00	0.00	0.00	0.00	
Rotary Kilns-Natural Gas Combustion - EU-101 and EU-102	0.16	0.65	0.65	0.05	8.59	0.47	7.21	0.16	0.15	Hexane
Natural Gas Combustion for heaters and boiler including: EU-119, EU-136, EU-141, EU-142, EU-143, EU-137, EU-138, EU-139, EU-140, EU-144, EU-145, EU-146, EU-147, EU-148, EU-149 and EU-151	0.06	0.23	0.23	0.02	2.99	0.16	2.51	0.06	0.05	Hexane
Plastic extrusion lines	0.00	0.00	0.00	0.00	0.00	0.99	0.00	0.00	0.00	
Natural gas-fired heaters; 170-173	0.01	0.05	0.05	0.00	0.69	0.04	0.58	0.01	0.01	Hexane
<b>Total Emissions</b>	<b>2,934.15</b>	<b>2,930.68</b>	<b>2,930.68</b>	<b>0.07</b>	<b>12.26</b>	<b>7.97</b>	<b>10.30</b>	<b>1.76</b>	<b>1.75</b>	<b>HCl</b>

**Appendix A: Emissions Calculations  
Summary**

Source Name: Ilpea Industries, Inc.  
Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170  
Permit Number: 143-37097-00018  
Permit Reviewer: Brian Williams

Controlled PTE (tons/year)										
Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAPs	Worst Single HAP
Rotary Kilns-Process Emissions - EU-101	7.69	1.83	1.83	0.00	0.00	0.00	0.00	0.14	0.14	HCl
Rotary Kilns-Process Emissions - EU-102	8.97	2.14	2.14	0.00	0.00	0.00	0.00	0.16	0.16	HCl
Silo - EU-103	0.68	0.68	0.68	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-105	0.68	0.68	0.68	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-106	0.27	0.28	0.28	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-107	0.27	0.27	0.27	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-108	0.40	0.40	0.40	0.00	0.00	0.00	0.00	0.00	0.00	
Moritz Mills - EU-152	1.10	1.10	1.10	0.00	0.00	0.00	0.00	0.00	0.00	
Moritz Mills - EU-153	1.10	1.10	1.10	0.00	0.00	0.00	0.00	0.00	0.00	
Moritz Mill - EU-154	109.50	109.50	109.50	0.00	0.00	0.00	0.00	0.00	0.00	
Weigh Hopper - EU-156	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Weigh Hopper - EU-157	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Weigh Hopper - EU158	3.39	3.39	3.39	0.00	0.00	0.00	0.00	0.00	0.00	
Weigh Hopper - EU-159	3.39	3.39	3.39	0.00	0.00	0.00	0.00	0.00	0.00	
Cybec Mixer EU123C	4.17	2.09	2.09	0.00	0.00	0.00	0.00	0.00	0.00	
Cybec Mixer EU125	4.17	2.09	2.09	0.00	0.00	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-112	0.25	0.25	0.25	0.00	0.00	2.30	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-113	0.05	0.05	0.05	0.00	0.00	0.46	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-115	0.08	0.08	0.08	0.00	0.00	0.79	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-116	0.08	0.08	0.08	0.00	0.00	0.79	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-117	0.11	0.11	0.11	0.00	0.00	0.99	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-118	0.11	0.11	0.11	0.00	0.00	0.99	0.00	0.00	0.00	
Banbury Mixer- EU-122	2.11	2.11	2.11	0.00	0.00	0.00	0.00	0.00	0.00	
Twin Banbury/Extruder Mixer Line - EU-123B	1.71	1.71	1.71	0.00	0.00	0.00	0.00	0.00	0.00	
Rotary Kilns-Natural Gas Combustion - EU-101 and EU-102	0.16	0.65	0.65	0.05	8.59	0.47	7.21	0.16	0.15	Hexane
Natural Gas Combustion for heaters and boiler including: EU-119, EU-136, EU-141, EU-142, EU-143, EU-137, EU-138, EU-139, EU-140, EU-144, EU-145, EU-146, EU-147, EU-148, EU-149 and EU-151	0.06	0.23	0.23	0.02	2.99	0.16	2.51	0.06	0.05	Hexane
Plastic extrusion lines	0.00	0.00	0.00	0.00	0.00	0.99	0.00	0.00	0.00	
Natural gas-fired heaters; 170-173	0.01	0.05	0.05	0.00	0.69	0.04	0.58	0.01	0.01	Hexane
<b>Total Emissions</b>	<b>150.50</b>	<b>134.35</b>	<b>134.35</b>	<b>0.07</b>	<b>12.26</b>	<b>7.97</b>	<b>10.30</b>	<b>0.54</b>	<b>0.31</b>	<b>HCl</b>

Controlled PTE includes the potential to emit following the use of pollution control devices, including the baghouses and wet scrubber associated with these operations.

**Appendix A: Emissions Calculations Summary**

**Source Name:** Ilpea Industries, Inc.  
**Source Location:** 1320 S. Main Street, Scottsburg, Indiana 47170  
**Permit Number:** 143-37097-00018  
**Permit Reviewer:** Brian Williams

Emission Unit	Limited PTE (tons/year)								Worst Single HAP	
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs		
Rotary Kilns-Process Emissions - EU-101	23.56	4.16	4.16	0.00	0.00	0.00	0.00	0.71	0.71	HCl
Rotary Kilns-Process Emissions - EU-102	26.15	4.86	4.86	0.00	0.00	0.00	0.00	0.82	0.82	HCl
Silo - EU-103	5.21	5.21	5.21	0.00	0.00	0.00	0.00	0.00	0.00	
Silo EU-105	5.21	5.21	5.21	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-106	0.27	0.27	0.27	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-107	0.27	0.27	0.27	0.00	0.00	0.00	0.00	0.00	0.00	
Silo - EU-108	0.40	0.40	0.40	0.00	0.00	0.00	0.00	0.00	0.00	
Moritz Mills - EU-152	16.12	16.12	16.12	0.00	0.00	0.00	0.00	0.00	0.00	
Moritz Mills - EU-153	16.12	16.12	16.12	0.00	0.00	0.00	0.00	0.00	0.00	
Moritz Mill - EU-154	16.12	16.12	16.12	0.00	0.00	0.00	0.00	0.00	0.00	
Weigh Hopper - EU158	18.83	6.79	6.79	0.00	0.00	0.00	0.00	0.00	0.00	
Weigh Hopper - EU-159	18.83	6.79	6.79	0.00	0.00	0.00	0.00	0.00	0.00	
Cybec Mixer EU123C	4.17	2.09	2.09	0.00	0.00	0.00	0.00	0.00	0.00	
Cybec Mixer EU125	4.17	2.09	2.09	0.00	0.00	0.00	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-112	0.25	0.25	0.25	0.00	0.00	2.30	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-113	0.05	0.05	0.05	0.00	0.00	0.46	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-115	0.08	0.08	0.08	0.00	0.00	0.79	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-116	0.08	0.08	0.08	0.00	0.00	0.79	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-117	0.11	0.11	0.11	0.00	0.00	0.99	0.00	0.00	0.00	
Plastic Pellet Production Line - EU-118	0.11	0.11	0.11	0.00	0.00	0.99	0.00	0.00	0.00	
Banbury Mixer- EU-122										
Twin Banbury/Extruder Mixer Line - EU-123B	3.81	3.81	3.81	0.00	0.00	0.00	0.00	0.00	0.00	
Rotary Kilns-Natural Gas Combustion - EU-101 and EU-102	0.16	0.65	0.65	0.05	8.59	0.47	7.21	0.16	0.15	Hexane
Natural Gas Combustion for heaters and boiler including: EU-119, EU-136, EU-141, EU-142, EU-143, EU-137, EU-138, EU-139, EU-140, EU-144, EU-145, EU-146, EU-147, EU-148, EU-149 and EU-151	0.06	0.23	0.23	0.02	2.99	0.16	2.51	0.06	0.05	Hexane
Plastic extrusion lines	0.00	0.00	0.00	0.00	0.00	0.99	0.00	0.00	0.00	
Natural gas-fired heaters; 170-173	0.01	0.05	0.05	0.00	0.69	0.04	0.58	0.01	0.01	Hexane
<b>Total Emissions</b>	<b>160.17</b>	<b>91.92</b>	<b>91.92</b>	<b>0.07</b>	<b>12.26</b>	<b>7.97</b>	<b>10.30</b>	<b>1.76</b>	<b>1.53</b>	<b>HCl</b>

Limited PTE is the potential to emit of each unit based on the limits provided in this FESOP under 326 IAC 2-8 and 326 IAC 2-2.

**Appendix A: Emissions Calculations  
Particulate Emissions from Silos**

**Source Name: Ilpea Industries, Inc.  
Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170  
Permit Number: 143-37097-00018  
Permit Reviewer: Brian Williams**

							FESOP and PSD Minor limits	
Unit ID	Process	Amount PM/PM10 Collected (lb/hr)*	Uncontrolled Particulate Emissions (ton/yr)	Uncontrolled Particulate Emissions (lb/hr)	Control Efficiency (%)	Controlled Particulate Emissions PM/PM10/ PM2.5 (ton/yr)	Limited PM/PM10/ PM2.5 (lbs/hr)	Limited PM/PM10/ PM2.5 (tons/yr)
EU-103	Iron Oxide	15.3	67.82	15.48	99.00%	0.68	1.19	5.21
EU-105	Iron Oxide	15.3	67.82	15.48	99.00%	0.68	1.19	5.21
			<b>135.65</b>				<b>1.36</b>	<b>10.42</b>

\* The amount of PM, and PM10 collected previously indicated in Permit F143 - 32451 - 00018 , issued on August 5, 2013, that it was 14.7 lbs/hr for the process of 7000 tons per year.

Therefore, the amount of PM, and PM10 was adjusted for the process of 7,300 tons per year as follows:

The amount of PM/PM10/PM2.5 (lbs/hr) = 14.7 (lbs/hr) \* amount process 7,300 (tons/yr)/ 7000 (tons/yr).

\*Assume PM10 = PM2.5

**Methodology**

Uncontrolled PM/PM10 Emissions (ton/yr) = Amount Collected (lb/hr) / (Control Efficiency %) \* 8760 hr/yr \* 1 ton/2000 lbs

Controlled PM/PM10 Emissions (ton/yr) = Uncontrolled Emissions (ton/yr) \* (1 - Control Efficiency %)

Allowable PM emissions under 326 IAC 6-3-2					
Unit ID	Process	Maximum Throughput (tons/yr)	Maximum Throughput / Process Weight Rate (tons/hr)	Allowable PM Emissions (lb/hr)	Unlimited PM emissions (lb/hr)
EU-103	Iron Oxide	7,300	0.83	3.63	15.48
EU-105	Iron Oxide	7,300	0.83	3.63	15.48

**Methodology**

Maximum Throughput / Process Weight Rate (tons/hr) = Maximum Throughput (tons/year) / 8,760 hrs/year

Interpolation of the data in this table for process weight rates up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation: E = 4.10 \* P^0.67

**Appendix A: Emissions Calculations  
Particulate Emissions from Silos**

**Source Name: Ilpea Industries, Inc.  
Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170  
Permit Number: 143-37097-00018  
Permit Reviewer: Brian Williams**

Unit ID	Process	Maximum Throughput (tons/year)	PM/PM10/PM2.5 Emission Factor (lb/ton)	PTE PM/PM10/PM2.5 (lb/hr)	PTE PM/PM10/PM2.5 (tons/yr)
EU-106	Polyvinyl Chloride	5480.00	<b>0.10</b>	0.06	0.27
EU-107	Polyvinyl Chloride	5480.00	<b>0.10</b>	0.06	0.27
EU-108	Calcium Carbonate	7950.00	<b>0.10</b>	0.09	0.40
					0.95

\*Emission factors are from Fire 6.25, for SCC 3-05-007-07, cement manufacturing, unloading raw materials.

\*Assume PM10 = PM2.5

Note: the maximum capacity of EU-106 and EU-107 has been revised from 7950 tons per year to 5480 tons per year.

**Methodology**

PTE PM/PM10 (tons/yr) = Maximum Throughput (tons/yr) x Emission factor (lb/ton) x 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
Process Emissions  
Two (2) rotary calcining kilns**

Source Name: Ilpea Industries, Inc.  
Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170  
Permit Number: 143-37097-00018  
Permit Reviewer: Brian Williams

**Kiln #1 (EU-101)**

Maximum Capacity lb/hr	Annual Throughput ton/yr				Particulate Control	HCl Control Efficiency %	Cl Control Efficiency %		
3,000	13,140				99.1%	80.0%	95.00%		
<b>Unlimited PTE</b>									
Emission Factor in lb/ton	PM	PM10	HCl (stack test, lb/hr)	Cl (stack test, lb/hr)	<b>Controlled PM</b>	<b>Controlled PM10</b>	<b>Controlled HCl</b>	<b>Controlled Cl</b>	
	130.0	31.0	0.13	0.01					
Potential Emission in tons/yr	854	204	0.71	0.05	7.69	1.83	0.14	0.01	

**Kiln#2 (EU-102)**

Maximum Capacity lb/hr	Annual Throughput ton/yr				Particulate	HCl Control	Cl Control		
3,500	15,330				99.1%	80.0%	95.00%		
<b>Unlimited PTE</b>									
Emission Factor in lb/ton	PM	PM10	HCl (stack test, lb/hr)	Cl (stack test, lb/hr)	<b>Controlled PM</b>	<b>Controlled PM10</b>	<b>Controlled HCl</b>	<b>Controlled Cl</b>	
	130.0	31.0	0.15	0.01					
Potential Emission in tons/yr	996.45	237.62	0.82	0.05	8.97	2.14	0.16	0.003	

\*Emission factors for PM and PM10 are from AP-42, Chapter 11.6, Table 11.6.2. HCl and Cl emission factors are based from stack test data from the equipment in use at its previous facility.  
\* Assume PM10 = PM2.5

**Methodology**

Potential to Emit PM/PM10(tons/yr) = Annual Throughput (ton/yr) x Emission Factor (lb/ton) x 1 ton /2,000 lb  
Potential to Emit HCl (tons/yr) = Collected by Scrubber (tons/yr) / Control Efficiency (%)

**326 IAC 6-3-2(e) Allowable Rate of Emissions**

Unit ID#	Maximum capacity of Rotary Kiln (lbs/hr)	Process Weight Rate (tons/hr)	Allowable PM Emissions (lbs/hr)	Allowable PM Emissions (tons/yr)	Unlimited PM emissions (lbs/hr)
EU-101	3,000	1.50	5.38	23.56	195
EU-102	3,500	1.75	5.97	26.13	227.5

**FESOP and PSD Minor Limits**

Limited PM Emissions (lbs/hr)	Limited PM Emissions (tons/yr)	Limited PM10/PM2.5 (lbs/hr)	Limited PM10/PM2.5 (tons/yr)
5.38	23.56	0.95	4.16
5.97	26.15	1.11	4.86
Total			9.02

Notes for the Rotary Kilns: PM emissions allowable under 6-3-2 and PM10/PM2.5 emissions are limited under FESOP.

**Appendix A: Emissions Calculations  
Process Emissions  
Three (3) Moritz Mills**

**Source Name: Ilpea Industries, Inc.  
Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170  
Permit Number: 143-37097-00018  
Permit Reviewer: Brian Williams**

**Moritz Mills (EU-152 & EU-153)**

Maximum Capacity lb/hr Total of both	Annual Throughput ton/yr	Control Efficiency
3,400	14,892	99.0%

Emission Factor in lb/hr	PM 25.0	PM2.5 25.0	PM10 25.0	<b>Controlled PM/PM10/PM2.5</b>
Potential Emission in tons/yr	<b>110</b>	<b>110</b>	<b>110</b>	<b>1.10</b>
Potential Emission for 2 Mills (tons/yr):	<b>219</b>	<b>219</b>	<b>219</b>	<b>2.19</b>

**Moritz Mills (EU-154)**

Maximum Capacity lb/hr	Annual Throughput ton/yr	Control Efficiency
1,700	7,446	99.0%

Emission Factor in lb/hr	<b>PM 25.0</b>	<b>PM10 25.0</b>	<b>PM2.5 25.0</b>	<b>Controlled PM/PM10/PM2.5</b>
Potential Emission in tons/yr	<b>110</b>	<b>110</b>	<b>110</b>	<b>1.10</b>

\*Emission factors are based on baghouse collections and their efficiencies and the production run on each mill.

Note: The emission factor of 25 lb/hr has been changed in this revision from 35 lbs/hr to be similar to the existing unit, since the capacity of this unit has been decreased in this revision.

\*Assume PM10 = PM2.5

**Methodology**

Potential to Emit PM and PM10 (tons/yr) = Emission Factor (lb/hr) x (8760 hr/year) x 1 ton/2,000 lb

Controlled PM/PM10 (tons/yr) = PTE PM/PM10 x (1 - Control Efficiency %)

**326 IAC 6-3-2(e) Allowable Rate of Emissions**

Unit ID#	Maximum capacity of Moritz Mills (lbs/hr)	Process Weight Rate (tons/hr)	Allowable PM Emissions (lbs/hr)	Allowable PM Emissions (tons/yr)	Unlimited PM emissions (lb/hr)
EU-152	1,700	0.85	3.68	16.11	25
EU-153	1,700	0.85	3.68	16.11	25
EU-154	1,700	0.85	3.68	16.11	25
				48.32	

<b>FESOP and PSD Minor Limits</b>	
Limited PM/PM10/PM2.5 Emissions (lb/hr)	Limited PM/PM10/PM2.5 Emissions (tons/yr)
3.68	16.12
3.68	16.12
3.68	16.12
	48.36

Notes for the Moritz Mills: PM emissions allowable under 6-3-2 and PM10/PM2.5 emissions are limited under FESOP.

**Appendix A: Emissions Calculations  
Particulate Emissions from (C-158 thru C-159)**

**Source Name: Ilpea Industries, Inc.  
Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170  
Permit Number: 143-37097-00018  
Permit Reviewer: Brian Williams**

Units	Control Device	Uncontrolled Emissions (PM/PM10/PM2.5)		Control Efficiency	Controlled Emissions (PM/PM10/PM2.5)	
		(lb/hr)	(tons/yr)	(%)	(lb/hr)	(tons/yr)
EU-158	C-158	26.0	113.9	97.02%	0.77	3.39
EU-159	C-159	26.0	113.9	97.02%	0.77	3.39

**Notes:**

\*\*The PM are based on baghouse information of laden inlet gas of the control device provided by source, as indicated in the F143-32451-00018, on August 5, 2013.  
Assume PM = PM10 = PM2.5

**Methodology**

Uncontrolled PM/PM10 Emissions (ton/yr) = Particulate inlet (lb/hr) \* 8760 hr/yr \* 1 ton/2000 lbs  
Controlled PM/PM10 Emissions (lb/hr) = Uncontrolled Emissions (lb/hr) \* (1 - Control Efficiency %)  
Controlled PM/PM10 Emissions (ton/yr) = Controlled Emissions (lbs/hr) \* 8760 hrs/yr \* 1 ton/2000 lbs

**326 IAC 6-3-2(e) Allowable Rate of Emissions**

Unit ID#	Maximum capacity of Weigh Hopper	Process Weight Rate	Allowable PM Emissions	Allowable PM Emissions	PSD Minor Limit (PM)
	(lbs/hr)	(tons/hr)	(lbs/hr)	(tons/yr)	(tons/yr)
EU-158	870.00	0.44	2.35	10.28	18.83
EU-159	870	0.44	2.35	10.28	18.83

FESOP and PSD Minor Limit	
Limited PM10/PM2.5 Emissions	Limited PM10/PM2.5 Emissions
(lb/hr)	(tons/yr)
1.55	6.79
1.55	6.79

Notes for the Weigh Hoppers: PM emissions allowable under 6-3-2 and PM10/PM2.5 emissions are limited under FESOP.

**Appendix A: Emissions Calculations  
Particulate Emissions from Mixers**

**Source Name: Ilpea Industries, Inc.  
Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170  
Permit Number: 143-37097-00018  
Permit Reviewer: Brian Williams**

Unit ID	Process	Maximum Throughput (lbs/batch)	Maximum Throughput (tons/day)	PM Emission Factor (lb/ton)*	PM10/PM2.5 Emission Factor (lb/ton)*	PTE PM (lb/day)	PTE PM (lb/hr)	PTE PM10/PM2.5 (lbs/day)	PTE PM (tons/yr)	PTE PM10/PM2.5 (tons/yr)
EU-123C	Cibec Mixer	9,530	38.12	0.60	0.30	22.87	0.95	11.44	4.17	2.09
EU-125	Cibec Mixer	9,530	38.12	0.60	0.30	22.87	0.95	11.44	4.17	2.09
									8.35	4.17

\*Emission factors are from Fire 6.25, for SCC 3-05-012-23, fiberglass manufacturing, mixing and weighting.  
\*Assume PM10 = PM2.5

**Methodology**

The maximum throughput (tons/day) = maximum throughput (lbs/batch) \* 8 (batch/day)/2000 (lbs/ton)  
PTE PM10/PM2.5 (lbs/day) = Maximum Throughput (tons/day) x Emission factor (lb/ton)  
PTE PM10/PM2.5 (tons/yr) = Maximum Throughput (tons/day) x Emission factor (lb/ton) x 1 ton/2000 lbs x365 days/yr

Allowable PM emissions under 326 IAC 6-3-2			
Unit ID	Process	Maximum Throughput (tons/hr)*	Allowable PM Emissions (lb/hr)
EU-123C	Cibec Mixer	1.59	5.59
EU-125	Cibec Mixer	1.59	5.59

**Methodology**

Process Weight Rate (tons/hr) = Maximum Throughput (tons/day) / 24hrs/day  
Interpolation of the data in this table for process weight rates up to sixty thousand (60,000) pounds per hour: E = 4.10 \* P^0.67  
Allowable PM Limit = 4.10 \* P^0.67

**Appendix A: Emissions Calculations  
VOC and Particulate Emissions from Pellet Production (EU-112 through EU-119)**

**Source Name: Ilpea Industries, Inc.  
Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170  
Permit Number: 143-37097-00018  
Permit Reviewer: Brian Williams**

Unit ID	Material Processed	Process Weight (lb/hr)	Process Weight (tons/yr)	PM Emission Factor (lb/ton)	PTE PM (tons/year)	PM10 Emission Factor (lb/ton)	PTE PM10/PM2.5 (tons/year)	VOC Emission Factor (lb/ton)	PTE VOC (tons/year)
EU-112	Plastic Pellets	3,500	15,330	0.032	0.25	0.032	0.25	0.30	2.30
EU-113	Plastic Pellets	700	3,066	0.032	0.05	0.032	0.05	0.30	0.46
EU-115	Plastic Pellets	1,200	5,256	0.032	0.08	0.032	0.08	0.30	0.79
EU-116	Plastic Pellets	1,200	5,256	0.032	0.08	0.032	0.08	0.30	0.79
EU-117	Plastic Pellets	1,500	6,570	0.032	0.11	0.032	0.11	0.30	0.99
EU-118	Plastic Pellets	1,500	6,570	0.032	0.11	0.032	0.11	0.30	0.99
<b>Total</b>					<b>0.67</b>		<b>0.67</b>		<b>6.31</b>

Notes: The PM, PM10, and VOC emission factors are based on emission factors for a similar facility (Chemtrusion, FESOP 019-9668-00091), the EF based on the SCC: 3-01-018-21.

\*Assume PM10 = PM2.5

**Methodology:**

Potential to emit PM, PM10, and VOC (tons/year) = Maximum Process Weight (tons/yr) x Emission Factor (lb/ton) x 1 ton/2000 lbs

The plastic pellet production lines are not subject to 326 IAC 6-3-2 because the potential to emit PM from each unit is less than 0.551 pounds per hour, exempt.

**Appendix A: Emissions Calculations  
VOC and Particulate Emissions from one (1) Banbury Mixer (EU-122)  
and Twin Banbury/Extruder/Mixer Line (EU-123B)**

Source Name: Ilpea Industries, Inc.  
Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170  
Permit Number: 143-37097-00018  
Permit Reviewer: Brian Williams

Unit ID	Control Device	Process	Process Weight (lb/hr)	Process Weight (tons/yr)	PM Emission Factor (lb/ton)	PTE PM (tons/year)	PM10 Emission Factor (lb/ton)	PTE PM10 (tons/year)	Control Efficiency (%)	Controlled PTE PM/PM (tons/year)	Controlled PTE PM/PM (lbs/hr)
EU-122	C-122	Banbury Mixer (EU-122)	3,700	16,206	26.0	210.68	26.0	210.68	99.00%	2.11	0.48
EU-123B		Twin Banbury/Extruder/Mixer Line (EU-123B)	3,000	13,140	26.0	170.82	26.0	170.82	99.00%	1.71	0.39
<b>Total</b>						<b>381.50</b>		<b>381.50</b>		<b>3.81</b>	<b>0.87</b>

Notes: The PM/PM10 emission factors are based on baghouse collection information.  
The baghouse C-122 is a common control device used for twin banbury/extruder/mixer line EU-123B and Banbury Mixer EU-122.  
Stack testing will be required in this FESOP to verify the emission factors.  
\*Assume PM10 = PM2.5

**Methodology:**

Potential to emit PM/PM10 (tons/year) = Emission Factor (lb/hr) x 8,760 hr/year x 1 ton/2000 lbs

Unit ID#	Maximum capacity of Banbury Mixers (lbs/hr)	326 IAC 6-3-2 PM Allowable Rate of Emissions			
		Process Weight Rate (tons/hr)	Allowable PM Emissions (lbs/hr)	Allowable PM Emissions (tons/yr)	Unlimited PM emissions (lb/hr)
EU-122	3,700	1.85	6.19	27.12	48.1
EU-123B	3,000	1.50	5.38	23.56	39.0

FESOP and PSD Minor Limits	
Limited PM/PM10/PM2.5 Emissions (lbs/hr)	Limited PM/PM10/PM2.5 Emissions (tons/yr)
0.87	3.81

Notes for the Banbury Mixers: PM emissions allowable under 6-3-2 and PM10/PM2.5 emissions are limited under FESOP.

**Appendix A: Emissions Calculations  
VOC from Plastic Extrusion Lines**

**Source Name: Ilpea Industries, Inc.  
Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170  
Permit Number: 143-37097-00018  
Permit Reviewer: Brian Williams**

<b>Process</b>	<b>Maximum capacity (lbs/hr)</b>	<b>No. Units</b>	<b>Emissions Factor (lbs/ton)</b>	<b>Total Throughput (lbs/hr)</b>	<b>Total Throughput (tons/hr)</b>	<b>VOC Emissions (lbs/hr)</b>	<b>VOC Emissions (tons/yr)</b>
<b>Plastic Extrusion Line</b>	<b>300</b>	<b>5</b>	<b>0.3</b>	<b>1500.0</b>	<b>0.75</b>	<b>0.23</b>	<b>0.99</b>

**Methodology**

The VOC emission factor provided by source and is based on the similarity of the process materials.

Total throughput (lbs/hr) = (Maximum capacity of each unit in lbs/hr) \* 5 units

Total throughput (tons/hr) = (Total throughput in lbs/hr)/2000 (lbs/ton)

Potential Emissions (lbs/hr) = (E.F. in lbs/ton)\* (throughput in ton/hour)

Potential Emissions (tons/yr) = (E.F. in lbs/ton)\* (throughput in ton/hour) \* 8760 hrs/yr / 2000 lbs/hr

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Source Name: Ilpea Industries, Inc.**

**Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170**

**Permit Number: 143-37097-00018**

**Permit Reviewer: Brian Williams**

Unit	ID#	MMBtu/hr	Total
Air make-up	EU-119	1.1	1.1
Space Heaters	EU-136, EU-141, EU-142 and EU-143	0.14	0.56
Space Heaters	EU-137, EU-138, EU-139, EU-140, EU-144, EU-145, EU-146 and EU-147	0.25	2.00
Space Heaters	EU-148 and EU-149	0.4	0.8
Cleaver Brooks Boiler	EU-151	2.5	2.5
			6.96

Heat Input Capacity	HHV	Potential Throughput
MMBtu/hr	mmBtu	MMCF/yr
	mmscf	
6.96	1020	59.8

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.06	0.23	0.23	0.02	2.99	0.16	2.51

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

\*Assume PM10 = PM2.5

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	6.3E-05	3.6E-05	2.2E-03	0.05	1.0E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.5E-05	3.3E-05	4.2E-05	1.1E-05	6.3E-05

Total	0.06
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The five highest organic and metal HAPs emission factors are provided above.

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

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Source Name: Ilpea Industries, Inc.  
 Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170  
 Permit Number: 143-37097-00018  
 Permit Reviewer: Brian Williams**

**From two (2) rotary calcinating kilns (EU-101 and EU-102)**

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
20.0	1020	171.8

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.16	0.65	0.65	0.05	**see below	0.47	7.21

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

**Methodology**

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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.8E-04	1.0E-04	6.4E-03	0.15	2.9E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	4.3E-05	9.4E-05	1.2E-04	3.3E-05	1.8E-04

<b>Total</b>	<b>0.16</b>
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The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
(170-173)**

**Source Name: Ilpea Industries, Inc.  
Source Location: 1320 S. Main Street, Scottsburg, Indiana 47170  
Permit Number: 143-37097-00018  
Permit Reviewer: Brian Williams**

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
1.6	1020	13.7

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.0	0.1	0.1	0.0	0.7	0.0	0.6

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

**Methodology**

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

**HAPS Calculations**

Emission Factor in lb/MMcf	HAPs - Organics					
	Benzene	Dichlorobenze	Formaldehyde	Hexane	Toluene	Total - Organics
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.443E-05	8.245E-06	5.153E-04	1.237E-02	2.336E-05	<b>1.293E-02</b>

Emission Factor in lb/MMcf	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	3.435E-06	7.558E-06	9.619E-06	2.611E-06	1.443E-05	<b>3.765E-05</b>

<b>Total HAPs</b>	<b>1.297E-02</b>
<b>Worst HAP</b>	<b>1.237E-02</b>

Methodology is the same as above.

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



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## Notice of Public Comment

**June 2, 2016**  
**Ilpea Industries, Inc.**  
**143-37097-00018**

Dear Concerned Citizen(s):

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

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

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

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

Enclosure  
PN AAA Cover.dot 2/17/2016



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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

June 2, 2016

Ms. Heidi Morris  
Ilpea Industries, Inc.  
745 Gardener Street  
Scottsburg, IN 47170

Re: Public Notice  
Ilpea Industries, Inc.  
Permit Level: Significant Permit Revision  
Permit Number: 143-37097-00018

Dear Ms. Morris:

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

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Scott County Journal in Scottsburg, Indiana publish the abbreviated version of the public notice no later than June 11, 2016. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Scott County Public Library, 108 South Main Street in Scottsburg, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Brain Williams, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5375 or dial (317) 234-5375..

Sincerely,

*Greg Hotopp*

Greg Hotopp  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover letter 2/17/2016



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**Michael R. Pence**  
*Governor*

**Carol S. Comer**  
*Commissioner*

June 2, 2016

To: Scott County Public Library

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

**Applicant Name: Ilpea Industries, Inc.**  
**Permit Number: 143-37097-00018**

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures  
PN Library.dot 2/16/2016



# Indiana Department of Environmental Management

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**Michael R. Pence**  
*Governor*

**Carol S. Comer**  
*Commissioner*

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

June 2, 2016

Scott County Journal  
PO Box 159  
Scottsburg, IN 47170

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Ilpea Industries, Inc., Scott County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than June 11, 2016.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

**To ensure proper payment, please reference account # 100174737.**

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Greg Hotopp at 800-451-6027 and ask for extension 4-3493 or dial 317-234-3493.

Sincerely,

*Greg Hotopp*

Greg Hotopp  
Permit Branch  
Office of Air Quality

Permit Level: Significant Permit Revision  
Permit Number: 143-37097-00018

Enclosure

PN Newspaper.dot 2/17/2016

# Mail Code 61-53

IDEM Staff	GHOTOPP 6/2/2016 Ilpea Industries Inc 143-37097-00018 Draft		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Heidi Morris Ilpea Industries Inc 745 S Gardner St Scottsburg IN 47170 (Source CAATS)										
2		Wayne Heverly VP of Operations Ilpea Industries Inc 745 S Gardner St Scottsburg IN 47170 (RO CAATS)										
3		Scott County Health Department 1471 N. Gardner St Scottsburg IN 47170-7751 (Health Department)										
4		Scottsburg City Council and Mayors Office 2 E. McLain Street Scottsburg IN 47170 (Local Official)										
5		Scott Co Public Library 108 S Main St Scottsburg IN 47170-1892 (Library)										
6		Scott County Commissioners 1 E. McClain Ave., County Courthouse Scottsburg IN 47170 (Local Official)										
7		Jennifer James-Koenig Environmental Compliance Source PO Box 6849 New Albany IN 47151 (Consultant)										
8												
9												
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
7			