



# 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)

**Eric J. Holcomb**  
Governor

**Bruno L. Pigott**  
Commissioner

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and  
Federally Enforceable State Operating Permit (FESOP)

for Plastics Recycling, Incorporated in Marion County

FESOP No.: F097-40108-00789

The Indiana Department of Environmental Management (IDEM) has received an application from Plastics Recycling, Incorporated, located at 7601 Rockville Road, Indianapolis, Indiana, for a new source construction and FESOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Plastics Recycling, Incorporated, to construct and operate a new stationary plastics recycling plant.

The applicant intends to construct and operate new equipment that will emit air pollutants. The potential to emit regulated pollutants will be limited to less than the TV and/or PSD major threshold levels, respectively. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

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

Indianapolis-Marion County Public Library - Wayne Branch  
198 South Girls School Road  
Indianapolis, IN 46231

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

A copy of the preliminary findings is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

### 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 F097-40108-00789 in all correspondence.

**Comments should be sent to:**

Daniel W. Pell  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Daniel W. Pell or (317) 234-8532  
Or dial directly: (317) 234-8532  
Fax: (317) 232-6749 attn: Daniel W. Pell  
E-mail: [dpell@idem.IN.gov](mailto:dpell@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 Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Air Permit Legal Notices**

On November 14, 2018, the State of Indiana Environmental Rules Board adopted rule amendments to 326 IAC 2-1.1-6, 326 IAC 2-7-13, 326 IAC 2-7-17, 326 IAC 2-8-13, 326 IAC 2-8-18, and 326 IAC 2-12-1 (LSA #17-395), concerning legal notice provisions for air permits issued under the NSR and Title V permit programs and other air permits for which newspaper notices are published by IDEM OAQ. The adopted rule amendments require that IDEM OAQ provide electronic public notices on IDEM's website as the primary and consistent method for communicating air permit notices to the public. IDEM anticipates that the final (effective) rule amendments will be promulgated on or about March 14, 2019. The status of these rule amendments (LSA #17-395) and the final effective date will be posted on the following website: <https://www.in.gov/idem/legal/2351.htm>.

Until the rule amendments to 326 IAC 2-1.1-6, 326 IAC 2-7-13, 326 IAC 2-7-17, 326 IAC 2-8-13, 326 IAC 2-8-18, and 326 IAC 2-12-1 are promulgated final (effective), IDEM OAQ will publish both newspaper public notices and electronic public notices on IDEM's website. Once the rule amendments are promulgated final (effective), IDEM OAQ will no longer publish newspaper public notices and will only publish electronic public notices on IDEM's website.

Electronic public notices, including permitting, rulemaking, meeting, and hearing notices, are posted on IDEM's website at: <https://www.in.gov/idem/5474.htm>. Public notices posted on IDEM's webpage will be accessible for the duration of the public comment period.

IDEM OAQ provides alternative methods for receiving public notices, such as the interested parties mailing list. The IDEM OAQ interested parties mailing list consists of people who have asked to be notified by email list or direct mail delivery of air permit actions related to a specific source or multiple sources, or for all air permit actions in a certain county or multiple counties. If you would like to be added to the IDEM OAQ interested parties mailing list, call Patty Pear at (317) 233-6875 or call (800) 451-6027, select option 4, and ask for the "Permits Administration Section".

Citizens and interested parties can also subscribe to IDEM's regional public notice pages and receive an e-mail or text message to your phone every time IDEM adds information to a subscribed region at the following website: [https://public.govdelivery.com/accounts/INDEM/subscriber/new?qs=INDEM\\_3](https://public.govdelivery.com/accounts/INDEM/subscriber/new?qs=INDEM_3)

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

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 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 Daniel W. Pell or my staff at the above address.



Heath Hartley, Section Chief  
Permits Branch  
Office of Air Quality



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Commissioner

DRAFT

# **New Source Construction and Federally Enforceable State Operating Permit**

## **OFFICE OF AIR QUALITY**

**Plastics Recycling, Incorporated  
7601 Rockville Road  
Indianapolis, Indiana 46206**

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

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

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

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

Operation Permit No.: F097-40108-00789	
Master Agency Interest ID: 10845	
Issued by:	Issuance Date:
Heath Hartley, Section Chief Permits Branch Office of Air Quality	Expiration Date:

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## SECTION A SOURCE SUMMARY

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

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

---

The Permittee owns and operates a stationary plastics recycling plant.

Source Address:	7601 Rockville Road, Indianapolis, Indiana 46206
General Source Phone Number:	317-446-8296
SIC Code:	5093
County Location:	Marion (Wayne Township)
Source Location Status:	Nonattainment for SO <sub>2</sub> standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

#### Equipment formerly located at Pennsylvania Street Plant:

##### Grinding

- (a) One (1) plastic granulator, identified as Grinder #P1, approved in 2019 for construction, with a maximum throughput capacity of 1,000 pounds of plastic per hour, no control, and exhausting inside the building.
- (b) One (1) plastic granulator, identified as Grinder #P2, approved in 2019 for construction, with a maximum throughput capacity of 1,000 pounds of plastic per hour, no control, and exhausting inside the building.

##### Mixing

- (c) One (1) batch blender, identified as Master Batch Blender #1, approved in 2019 for construction, used for master batch blending of various types of granulated plastic, raw materials, and fines to create a blend of plastics that meet a required specification, with a maximum throughput capacity of 10,000 pounds of mixed plastics per hour, no control, and exhausting indoors.
- (d) One (1) batch blender, identified as Master Batch Blender #2, approved in 2019 for construction, used for master batch blending of various types of granulated plastic, raw materials, and fines to create a blend of plastics that meet a required specification, with a maximum throughput capacity of 6,000 pounds of plastics per hour, no control, and exhausting indoors.
- (e) One (1) batch blender, identified as Master Batch Blender #3, approved in 2019 for construction, used for master batch blending of various types of granulated plastic, raw materials, and fines to create a blend of plastics that meet a required specification, with a maximum throughput capacity of 6,000 pounds of plastics per hour, no control, and exhausting indoors.



- (f) One (1) batch blender, identified as Master Batch Blender #4, approved in 2019 for construction, used for master batch blending of various types of granulated plastic, raw materials, and fines to create a blend of plastics that meet a required specification, with a maximum throughput capacity of 6,000 pounds of plastics per hour, no control, and exhausting indoors.

**Extrusion Lines**

- (g) Extrusion Line #1 consisting of the following:
- (1) One (1) small blender, identified as Extrusion Blender #1, approved in 2019 for construction, with a maximum throughput capacity of 3,000 pounds of mixed plastics per hour, feeding directly into Extruder #1, no control, exhausting indoors.
  - (2) One (1) plastic extruder, identified as Extruder #1, approved in 2019 for construction, with a maximum throughput capacity of 3,000 pounds of blended plastics per hour, controlled by a cyclone, identified as Cyclone #1, and exhausting indoors.
  - (3) One (1) shaker table, identified as Shaker Table #1, approved in 2019 for construction, with a maximum throughput of 3,000 pounds of blended plastics per hour, no control, and exhausting indoors.
- (h) Extrusion Line #2, consisting of the following:
- (1) One (1) small blender, identified as Extrusion Blender #2, approved in 2019 for construction, with a maximum throughput capacity of 3,000 pounds of mixed plastics per hour, feeding directly into Extruder #2, no control, exhausting indoors.
  - (2) One (1) plastic extruder, identified as Extruder #2, approved in 2019 for construction, with a maximum throughput capacity of 2,000 pounds of blended plastics per hour, controlled by a cyclone, identified as Cyclone #2, and exhausting indoors.
  - (3) One (1) shaker table, identified as Shaker Table #2, approved in 2019 for construction, with a maximum throughput of 3,000 pounds of blended plastics per hour, no control, and exhausting indoors.
- (i) Extrusion Line #3, consisting of the following:
- (1) One (1) small blender, identified as Extrusion Blender #3, approved in 2019 for construction, with a maximum throughput capacity of 3,000 pounds of mixed plastics per hour, feeding directly into Extruder #3, no control, exhausting indoors.
  - (2) One (1) plastic extruder, identified as Extruder #3, approved in 2019 for construction, with a maximum throughput capacity of 2,500 pounds of blended plastics per hour, controlled by a cyclone, identified as Cyclone #3, and exhausting indoors.
  - (3) One (1) shaker table, identified as Shaker Table #3, approved in 2019 for construction, with a maximum throughput of 3,000 pounds of blended plastics per hour, no control, and exhausting indoors.
- (j) Extrusion Line #4, consisting of the following:
- (1) One (1) small blender, identified as Extrusion Blender #4, approved in 2019 for construction, with a maximum throughput capacity of 3,000 pounds of mixed plastics per hour, feeding directly into Extruder #4, no control, exhausting indoors.

- (2) One (1) plastic extruder, identified as Extruder #4, approved in 2019 for construction, with a maximum throughput capacity of 2,500 pounds of blended plastics per hour, controlled by a cyclone, identified as Cyclone #4, and exhausting indoors.
  - (3) One (1) shaker table, identified as Shaker Table #4, approved in 2019 for construction, with a maximum throughput of 3,000 pounds of blended plastics per hour, no control, and exhausting indoors.
- (k) Extrusion Line #5
- (1) One (1) shredder, identified as Extrusion Shredder, approved in 2019 for construction, with a maximum throughput of 3,000 pounds of mixed plastics per hour, feeding directly into the Densifier.
  - (2) One (1) densifier, identified as Densifier, approved in 2019 for construction, used for small-scale size reduction of clean plastic scrap, mixing and agglomeration of various types of granulated plastic, raw materials, and fines to create a formula for a required specification, with a maximum throughput capacity of 2,500 pounds of plastic per hour, feeding directly into Extruder #5.
  - (3) One (1) plastic extruder, identified as Extruder #5, approved in 2019 for construction, with a maximum throughput capacity of 2,500 pounds of blended plastics per hour, controlled by a cyclone, identified as Cyclone #5, and exhausting indoors.
  - (4) One (1) shaker table, identified as Shaker Table #5, approved in 2019 for construction, with a maximum throughput of 3,000 pounds of blended plastics per hour, no control, and exhausting indoors.

**Other**

- (l) Material handling and conveying operations, approved in 2019 for construction, with a maximum throughput capacity of 100,000 pounds of material per hour. Includes:
  - (1) Dumpers
  - (2) Hoppers
  - (3) Bulk Cargo Containers
  - (4) Conveyorsfor the transfer of clean granulated plastics, raw materials, fines and dust, throughout the facility, no control, and exhausting indoors.
- (m) One (1) guillotine cutter, identified as Guillotine #1, approved in 2019 for construction, for cutting large processed materials, such as rolls of sheets or large box-sized materials in half, with a maximum throughput of 5,000 pounds of plastic per hour, no control, and exhausting indoors.
- (n) Three (3) pneumatically-loaded, indoor silos for plastic pellet storage, each approved in 2019 for construction, each with a maximum storage capacity of 10,000 pounds; each with a loading/unloading rate of 1,000 pounds per hour; each using no control, and exhausting indoors.
- (o) Two (2) pneumatically-loaded silos for final product storage, each approved in 2019 for construction, each with a maximum storage capacity of 240,000 pounds; each with a loading/unloading rate of 20,000 pounds per hour; and equipped with a common cyclone on top for silo loading, and exhausting outside the building.
- (p) One (1) natural gas-fired bake off oven, identified as Oven, approved in 2019 for construction, to bake off the extrusion operations cutting dies, with a maximum heat input capacity of 2.3 MMBtu per hour, no control and exhausting inside the building.

- (q) Pressurized storage tanks for the following:
- (1) Liquid petroleum gas (LPG)
  - (2) Acetylene
  - (3) Compressed Oxygen
- (r) Activities related to routine fabrication, maintenance and repair of buildings, structures, equipment or vehicles at the source where air emissions from those activities would not be associated with any commercial production process including the following:
- (1) Blast-cleaning equipment using water as the suspension agent and associated equipment, including; one (1) LP gas powered heated pressure washer.
  - (2) Lubrication, including hand-held spray can lubrication, dipping metal parts into lubricating oil, and manual or automated addition of cutting oil in machining operations.
  - (3) Painting, including interior and exterior painting of buildings, and solvent use excluding degreasing operations utilizing halogenated organic solvents.
- (s) The use of cleaners and solvents, to maintain production equipment, characterized as:
- (1) having a vapor pressure equal to or less than two (2) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pound per square inch) measured at thirty-eight degrees Centigrade (38°C) (one hundred (100) degrees Fahrenheit); or
  - (2) having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty degrees Centigrade (20°C) (sixty-eight (68) degrees Fahrenheit);
- the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months.
- (t) Portable VOC and HAP storage containers used for the collection, storage, or disposal of materials provided the container capacity is equal to or less than forty-six hundredths (0.46) cubic meters and the container is closed except when the material is added or removed, including:
- (1) Lubricating oils
  - (2) Hydraulic oils
  - (3) Machining oils
  - (4) Machining fluids
- (u) Hand-held, aerosol, spray can applications of adhesive to affix shipping labels onto outgoing product containers.
- (v) Two (2) air compressors.

**Equipment formerly located at State Avenue Plant:**

**Plastic Shredding, Grinding, and Granulation**

- (w) One (1) Shredder/Granulator System, identified as Shredder #1, for size reduction of large plastic scrap into pieces small enough to be processed in the pelletizing lines, with a maximum throughput capacity of 4,000 pounds of plastic per hour, and including:
- (1) One (1) Shredder, identified as Unit #1-1, constructed in 2019, for large-scale size reduction of clean plastic scrap, equipped with a conveyor to route resized material to the Granulator, Unit #1-2, uncontrolled and exhausting inside the building.

- (2) One (1) Granulator, identified as Unit #1-2, constructed in 2019, for small-scale size reduction of clean plastic scrap, equipped with an Air Elutriation System, identified as Unit #1-3, for classifying ground plastic, dust and fines; with the scrap being separated by one (1) cyclone and exhausting into a baghouse, which exhausts inside the building.
- (x) One (1) Shredder/Granulator System, identified as Shredder #2, for size reduction of large plastic scrap into pieces small enough to be processed in the pelletizing lines, with a maximum throughput capacity of 4,000 pounds of plastic per hour, and including:
  - (1) One (1) Shredder, identified as Unit #2-1, constructed in 2019, for large-scale size reduction of clean plastic scrap, equipped with a conveyor to route resized material to the Plastic Granulator, Unit #2-2, uncontrolled and exhausting inside the building.
  - (2) One (1) Plastic Granulator, identified as Unit #2-2, constructed in 2019, for small-scale size reduction of clean plastic scrap, with a maximum throughput capacity of 4,000 pounds of plastic per hour, equipped with an Air Elutriation System, identified as Unit #2-3, for classifying ground plastic, dust and fines, with the scrap being separated by one (1) cyclone and exhausting into a baghouse, which exhausts inside the building.
- (y) One (1) Shredder/Granulator System, identified as Shredder #3, for size reduction of large plastic scrap into pieces small enough to be processed in the pelletizing lines, with a maximum throughput capacity of 4,000 pounds of plastic per hour, and including:
  - (1) One (1) Shredder, identified as Unit #3-1, constructed in 2019, for large-scale size reduction of clean plastic scrap, equipped with a conveyor to route resized material to the Plastic Granulator, Unit #3-2, uncontrolled and exhausting inside the building.
  - (2) One (1) Plastic Granulator, identified as Unit #3-2, constructed in 2019, for small-scale size reduction of clean plastic scrap, with a maximum throughput capacity of 4,000 pounds of plastic per hour, equipped with an Air Elutriation System, identified as Unit #2-3, for classifying ground plastic, dust and fines, with the scrap being separated by one (1) cyclone and exhausting into a baghouse, which exhausts inside the building.
- (z) One (1) Plastic Granulator, identified as Grinder #3-1, constructed in 2019, for small-scale size reduction of clean plastic scrap, with a maximum throughput capacity of 1,200 pounds of plastic per hour, controlled by one (1) cyclone and exhausting inside the building.

### **Material Handling and Conveying**

- (aa) Material handling and conveying operations, identified as SAP conveying, approved in 2019 for construction with a maximum throughput capacity of 50,000 pounds of material per hour, including: dumpers, conveyors, and bulk cargo containers (e.g., Gaylord Container Boxes), for the transfer of clean granulated plastics, raw materials, fines and dust, throughout the facility, uncontrolled and exhausting inside the building.

### **Material Separation**

- (bb) One (1) Hamos Magnetic Separator, identified as Hamos, constructed in 2019, for separating two different types of plastic that are mixed together through electromagnetism, with a maximum throughput capacity of 1,500 pounds of plastic per hour, controlled by an Air Equipment and Engineering Teknican separator for dust removal, exhausting into a filter bag house, which exhausts inside the building.

- (cc) One (1) shaker table, identified as shaker #4, constructed in 2019, for separating extruded plastic pellets from improperly sized scrap, with a maximum throughput capacity of 3,000 pounds of plastic pellets per hour, each, uncontrolled and exhausting inside the building.
- (dd) One (1) Tank Sink Float line, identified as Sink Float, constructed in 2019, for the classification and separation of plastic pellets, with a maximum throughput capacity of 1,500 pounds of pellets per hour, uncontrolled and exhausting inside the building.

**Equipment formerly located at Sam Jones Expressway Plant:**

**Food Container Line:**

- (ee) One (1) Trommel, identified as Trommel, approved in 2019 for construction, with a maximum capacity of 6.0 tons per hour, and exhausting indoors.
- (ff) One (1) Optical Sorter, identified as Optical Sorter, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (gg) Product Conveyors, identified as FL conveyors, each approved in 2019 for construction, with a maximum capacity of 1.0 tons per hour, and exhausting indoors.
- (hh) Two (2) Grinders, identified as Grinder #S1, and Grinder #S2, each approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, each, and exhausting indoors.
- (ii) Four (4) Attrition Washers, identified as Attrition Washer 1 through Attrition Washer 4, each approved in 2019 for construction, each with a maximum capacity of 0.5 tons per hour, and exhausting indoors.
- (jj) One (1) Rinse and Dewatering Operation, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (kk) One (1) Float/Sink Tank, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (ll) One (1) Electric Spin Dryer, identified as Dryer #1, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (mm) One (1) Cyclone Separator, approved in 2019 for construction, with a maximum capacity of 3.0 tons per hour, and exhausting indoors.
- (nn) One (1) Agglomerator Process, identified as Agglomerator, approved in 2019 for construction, with a maximum capacity of 3.0 tons per hour, consisting of a receiving hopper vented to bag filters, an agglomerator, a grinder vented to bag filters, an aspirator that returns fines to the agglomerator auger vented to bag filters, and a bulk receiving hopper vented to bag filters. All bag filters exhaust indoors.
- (oo) One (1) Extruder, identified as Extruder, approved in 2019 for construction, with a maximum capacity of 3.0 tons per hour, and exhausting indoors.
- (pp) One (1) Pelletizer, identified as Pelletizer, approved in 2019 for construction, with a maximum capacity of 1.0 tons per hour, and exhausting indoors.
- (qq) Three (3) Packaging operations, each approved in 2019 for construction, one with a maximum capacity of 1.5 tons per hour and two with a maximum capacity of 1.0 tons per hour, and exhausting indoors.

- (rr) One (1) Log Shredder, identified as Log Shredder, approved in 2019 for construction, with a maximum capacity of 0.75 tons per hour of compressed foam, using no controls, and exhausting indoors.
- (ss) One (1) Shredder, identified as Pre-Shredder, approved in 2019 for construction, with a maximum capacity of 0.10 tons per hour of foam scrap, using no controls, and exhausting indoors.
- (tt) One (1) shaker table, identified as Shaker Table #7, approved in 2019 for construction, with a maximum throughput of 3.0 tons of pellets per hour, no control, and exhausting indoors.
- (uu) One (1) Gaylord loading, identified as loading, approved in 2019 for construction, with a maximum throughput of 3.0 tons of pellets per hour, no control, and exhausting indoors.

**Hanger Line:**

- (vv) One (1) Electric Shredder, identified as Shredder, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (ww) One (1) Grinder, identified as Grinder #3, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (xx) One (1) Cyclone Separator, identified as C1, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (yy) One (1) Vibrating Screen, identified as Vibrating Screen, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (zz) Product Conveyors, identified as HL conveyors, approved in 2019 for construction, with a maximum capacity of 1.0 tons per hour, and exhausting indoors.
- (aaa) Four (4) Water Tanks, identified as Wash Tank #1 through Wash Tank #4, each approved in 2019 for construction, with a combined maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (bbb) Four (4) Hydroclones, identified as HC #1 through HC #4, each approved in 2019 for construction, with a combined maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (ccc) Two (2) Electric Dryer/Separators, identified as Spin dryers #3 and #4, each approved in 2019 for construction, with a combined maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (ddd) Two (2) Silos, identified as silos #1 and #2, each approved in 2019 for construction, with a combined maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (eee) One (1) Color Sorter, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (fff) One (1) Electric Spin Dryer, identified as Dryer #5, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (ggg) One (1) Packaging Operation, identified as HL Packaging, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.

**Existing Equipment:**

- (hhh) One (1) natural gas fired boiler, approved in 2019 for construction, with a maximum heat input capacity of 4.2 million Btu per hour (MMBtu/hr), exhausting to stack S2.

- (iii) One (1) force draft natural gas heater, identified as Q17, approved in 2019 for construction, with a maximum heat input capacity of 0.4 MM Btu/hr, exhausting to the atmosphere.
  - (jjj) Four (4) natural gas heating generators, each approved in 2019 for construction, each with a maximum heat input capacity of 0.125 MM Btu/hr, exhausting to the atmosphere.
  - (kkk) Eleven (11) force draft natural gas heaters, each approved in 2019 for construction, each with a maximum heat input capacity of 3.125 MM Btu/hr, exhausting to the atmosphere.
  - (III) One (1) soil and groundwater remediation system (air sparging, air stripping, soil vapor extraction), approved in 2019 for construction, consisting of soil vapor extraction well, sparging well, low profile air stripper, identified as Emissions Unit AS-1, with maximum air flow capacity of 300 acfm, and a maximum water flow rate of thirty (30) gallons per hour, and soil-vapor extraction (SVE) blower, identified as Emission Unit SVE-1, with maximum air flow capacity of 100 acfm, exhausting to R-1.
- (mmm) Paved Roads.

A.3 FESOP Applicability [326 IAC 2-8-2]

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

## SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

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

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

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- (a) This permit, F097-40108-00789, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 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.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

- (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 within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(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.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to F097-40108-00789 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (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 5  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

**C.2 Opacity [326 IAC 5-1]**

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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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.5 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.6 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.7 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.8 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(1)][326 IAC 2-8-5(a)(1)]**

#### **C.9 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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- (a) For new units:

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

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

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

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

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

**C.10 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.11 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 prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

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

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

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.12 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.13 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.14 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.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required monitoring data, reports, and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:
  - (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the FESOP.Records of required monitoring information include the following, where applicable:
  - (AA) The date, place, as defined in this permit, and time of sampling or measurements.
  - (BB) The dates analyses were performed.
  - (CC) The company or entity that performed the analyses.
  - (DD) The analytical techniques or methods used.
  - (EE) The results of such analyses.
  - (FF) The operating conditions as existing at the time of sampling or measurement.

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

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

**C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions

satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

#### **C.17 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:**

**Equipment formerly located at Pennsylvania Street Plant:**

**Grinding**

- (a) One (1) plastic granulator, identified as Grinder #P1, approved in 2019 for construction, with a maximum throughput capacity of 1,000 pounds of plastic per hour, no control, and exhausting inside the building.
- (b) One (1) plastic granulator, identified as Grinder #P2, approved in 2019 for construction, with a maximum throughput capacity of 1,000 pounds of plastic per hour, no control, and exhausting inside the building.

**Mixing**

- (c) One (1) batch blender, identified as Master Batch Blender #1, approved in 2019 for construction, used for master batch blending of various types of granulated plastic, raw materials, and fines to create a blend of plastics that meet a required specification, with a maximum throughput capacity of 10,000 pounds of mixed plastics per hour, no control, and exhausting indoors.
- (d) One (1) batch blender, identified as Master Batch Blender #2, approved in 2019 for construction, used for master batch blending of various types of granulated plastic, raw materials, and fines to create a blend of plastics that meet a required specification, with a maximum throughput capacity of 6,000 pounds of plastics per hour, no control, and exhausting indoors.
- (e) One (1) batch blender, identified as Master Batch Blender #3, approved in 2019 for construction, used for master batch blending of various types of granulated plastic, raw materials, and fines to create a blend of plastics that meet a required specification, with a maximum throughput capacity of 6,000 pounds of plastics per hour, no control, and exhausting indoors.
- (f) One (1) batch blender, identified as Master Batch Blender #4, approved in 2019 for construction, used for master batch blending of various types of granulated plastic, raw materials, and fines to create a blend of plastics that meet a required specification, with a maximum throughput capacity of 6,000 pounds of plastics per hour, no control, and exhausting indoors.

**Extrusion Lines**

- (g) Extrusion Line #1 consisting of the following:
  - (1) One (1) small blender, identified as Extrusion Blender #1, approved in 2019 for construction, with a maximum throughput capacity of 3,000 pounds of mixed plastics per hour, feeding directly into Extruder #1, no control, exhausting indoors.
  - (2) One (1) plastic extruder, identified as Extruder #1, approved in 2019 for construction, with a maximum throughput capacity of 3,000 pounds of blended plastics per hour, controlled by a cyclone, identified as Cyclone #1, and exhausting indoors.

- (3) One (1) shaker table, identified as Shaker Table #1, approved in 2019 for construction, with a maximum throughput of 3,000 pounds of blended plastics per hour, no control, and exhausting indoors.
- (h) Extrusion Line #2, consisting of the following:
  - (1) One (1) small blender, identified as Extrusion Blender #2, approved in 2019 for construction, with a maximum throughput capacity of 3,000 pounds of mixed plastics per hour, feeding directly into Extruder #2, no control, exhausting indoors.
  - (2) One (1) plastic extruder, identified as Extruder #2, approved in 2019 for construction, with a maximum throughput capacity of 2,000 pounds of blended plastics per hour, controlled by a cyclone, identified as Cyclone #2, and exhausting indoors.
  - (3) One (1) shaker table, identified as Shaker Table #2, approved in 2019 for construction, with a maximum throughput of 3,000 pounds of blended plastics per hour, no control, and exhausting indoors.
- (i) Extrusion Line #3, consisting of the following:
  - (1) One (1) small blender, identified as Extrusion Blender #3, approved in 2019 for construction, with a maximum throughput capacity of 3,000 pounds of mixed plastics per hour, feeding directly into Extruder #3, no control, exhausting indoors.
  - (2) One (1) plastic extruder, identified as Extruder #3, approved in 2019 for construction, with a maximum throughput capacity of 2,500 pounds of blended plastics per hour, controlled by a cyclone, identified as Cyclone #3, and exhausting indoors.
  - (3) One (1) shaker table, identified as Shaker Table #3, approved in 2019 for construction, with a maximum throughput of 3,000 pounds of blended plastics per hour, no control, and exhausting indoors.
- (j) Extrusion Line #4, consisting of the following:
  - (1) One (1) small blender, identified as Extrusion Blender #4, approved in 2019 for construction, with a maximum throughput capacity of 3,000 pounds of mixed plastics per hour, feeding directly into Extruder #4, no control, exhausting indoors.
  - (2) One (1) plastic extruder, identified as Extruder #4, approved in 2019 for construction, with a maximum throughput capacity of 2,500 pounds of blended plastics per hour, controlled by a cyclone, identified as Cyclone #4, and exhausting indoors.
  - (3) One (1) shaker table, identified as Shaker Table #4, approved in 2019 for construction, with a maximum throughput of 3,000 pounds of blended plastics per hour, no control, and exhausting indoors.
- (k) Extrusion Line #5
  - (1) One (1) shredder, identified as Extrusion Shredder, approved in 2019 for construction, with a maximum throughput of 3,000 pounds of mixed plastics per hour, feeding directly into the Densifier.
  - (2) One (1) densifier, identified as Densifier, approved in 2019 for construction, used for small-scale size reduction of clean plastic scrap, mixing and agglomeration of various types of granulated plastic, raw materials, and fines to create a formula for a required

specification, with a maximum throughput capacity of 2,500 pounds of plastic per hour, feeding directly into Extruder #5.

- (3) One (1) plastic extruder, identified as Extruder #5, approved in 2019 for construction, with a maximum throughput capacity of 2,500 pounds of blended plastics per hour, controlled by a cyclone, identified as Cyclone #5, and exhausting indoors.
- (4) One (1) shaker table, identified as Shaker Table #5, approved in 2019 for construction, with a maximum throughput of 3,000 pounds of blended plastics per hour, no control, and exhausting indoors.

**Other**

- (l) Material handling and conveying operations, approved in 2019 for construction, with a maximum throughput capacity of 100,000 pounds of material per hour. Includes:
  - (1) Dumpers
  - (2) Hoppers
  - (3) Bulk Cargo Containers
  - (4) Conveyorsfor the transfer of clean granulated plastics, raw materials, fines and dust, throughout the facility, no control, and exhausting indoors.
- (m) One (1) guillotine cutter, identified as Guillotine #1, approved in 2019 for construction, for cutting large processed materials, such as rolls of sheets or large box-sized materials in half, with a maximum throughput of 5,000 pounds of plastic per hour, no control, and exhausting indoors.
- (n) Three (3) pneumatically-loaded, indoor silos for plastic pellet storage, each approved in 2019 for construction, each with a maximum storage capacity of 10,000 pounds; each with a loading/unloading rate of 1,000 pounds per hour; each using no control, and exhausting indoors.
- (o) Two (2) pneumatically-loaded silos for final product storage, each approved in 2019 for construction, each with a maximum storage capacity of 240,000 pounds; each with a loading/unloading rate of 20,000 pounds per hour; and equipped with a common cyclone on top for silo loading, and exhausting outside the building.
- (p) One (1) natural gas-fired bake off oven, identified as Oven, approved in 2019 for construction, to bake off the extrusion operations cutting dies, with a maximum heat input capacity of 2.3 MMBtu per hour, no control and exhausting inside the building.

(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 Particulate [326 IAC 6.5-1-2]**

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Pursuant to 326 IAC 6.5-1-2(a), particulate emissions from each of the following emission units shall not exceed the grain per dry standard cubic foot (dscf) limit listed in the table below:

Emission Unit	PM Limit (grain/dscf)
Grinder #1	0.03
Grinder #2	0.03
Extrusion Blender #1	0.03
Extruder #1	0.03
Shaker Table #1	0.03
Extrusion Blender #2	0.03
Extruder #2	0.03
Shaker Table #2	0.03
Extrusion Blender #3	0.03
Extruder #3	0.03
Shaker Table #3	0.03
Extrusion Blender #4	0.03
Extruder #4	0.03
Shaker Table #4	0.03
Extrusion Blender #5	0.03
Extruder #5	0.03
Shaker Table #5	0.03
Extrusion Shredder	0.03
Densifier	0.03
Master Batch Blender #1	0.03
Master Batch Blender #2	0.03
Master Batch Blender #3	0.03
Master Batch Blender #4	0.03
Material Handling and Conveying	0.03
Indoor Silo	0.03
Indoor Silo	0.03
Indoor Silo	0.03
Final Product Storage Silo	0.03
Final Product Storage Silo	0.03
Bake Off Oven	0.03

**D.1.2 Incinerators [326 IAC 4-2-2]**

Pursuant to 326 IAC 4-2 (Incinerators), the natural gas-fired bake off oven shall:

- (a) Consist of primary and secondary chambers or the equivalent;
- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 and 326 IAC 2;
- (d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in 326 IAC 4-2-2(c); and
- (e) Not emit particulate matter in excess of one (1) of the following:
  - (1) Three-tenths (0.3) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions correct to fifty percent (50%) excess air for incinerators with solid waste capacity of greater than or equal to two hundred (200) pounds per hour.
  - (2) Five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%)

excess air for incinerators with solid waste capacity of less than two hundred (200) pounds per hour.

- (f) If any of the requirements of (a) through (e) above are not met, the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

The Permittee operating the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

#### D.1.3 Carbon Monoxide Emission Limits [326 IAC 9-1-2]

Pursuant to 326 IAC 9-1-2 (Carbon Monoxide Emission Limits), the Permittee shall not operate natural gas-fired bake off oven, unless the waste gas stream is burned in one of the following:

- (a) Direct-flame afterburner; or
- (b) Secondary chamber.

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

A Preventive Maintenance Plan is required for these facilities and any 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 assure compliance with Condition D.1.1, the cyclones for particulate control shall be in operation and control emissions from the plastic extruders at all times the plastic extruders are in operation.
- (b) In order to assure compliance with Condition D.1.1, the cyclones for particulate control, located atop the two (2) final product storage silos, shall be in operation and control emissions from the two (2) final product storage silo loading operations at all times when the two (2) final product storage silo loading equipment is in operation.

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

#### D.1.6 Cyclone Failure Detection

In the event that a cyclone malfunction has been observed:

Failed units and the associated process will be shut down immediately until the failed units 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 emission 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).

**SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

**Equipment formerly located at State Avenue Plant:**

**Plastic Shredding, Grinding, and Granulation**

- (w) One (1) Shredder/Granulator System, identified as Shredder #1, for size reduction of large plastic scrap into pieces small enough to be processed in the pelletizing lines, with a maximum throughput capacity of 4,000 pounds of plastic per hour, and including:
  - (1) One (1) Shredder, identified as Unit #1-1, constructed in 2019, for large-scale size reduction of clean plastic scrap, equipped with a conveyor to route resized material to the Granulator, Unit #1-2, uncontrolled and exhausting inside the building.
  - (2) One (1) Granulator, identified as Unit #1-2, constructed in 2019, for small-scale size reduction of clean plastic scrap, equipped with an Air Elutriation System, identified as Unit #1-3, for classifying ground plastic, dust and fines; with the scrap being separated by one (1) cyclone and exhausting into a baghouse, which exhausts inside the building.
- (x) One (1) Shredder/Granulator System, identified as Shredder #2, for size reduction of large plastic scrap into pieces small enough to be processed in the pelletizing lines, with a maximum throughput capacity of 4,000 pounds of plastic per hour, and including:
  - (1) One (1) Shredder, identified as Unit #2-1, constructed in 2019, for large-scale size reduction of clean plastic scrap, equipped with a conveyor to route resized material to the Plastic Granulator, Unit #2-2, uncontrolled and exhausting inside the building.
  - (2) One (1) Plastic Granulator, identified as Unit #2-2, constructed in 2019, for small-scale size reduction of clean plastic scrap, with a maximum throughput capacity of 4,000 pounds of plastic per hour, equipped with an Air Elutriation System, identified as Unit #2-3, for classifying ground plastic, dust and fines, with the scrap being separated by one (1) cyclone and exhausting into a baghouse, which exhausts inside the building.
- (y) One (1) Shredder/Granulator System, identified as Shredder #3, for size reduction of large plastic scrap into pieces small enough to be processed in the pelletizing lines, with a maximum throughput capacity of 4,000 pounds of plastic per hour, and including:
  - (1) One (1) Shredder, identified as Unit #3-1, constructed in 2019, for large-scale size reduction of clean plastic scrap, equipped with a conveyor to route resized material to the Plastic Granulator, Unit #3-2, uncontrolled and exhausting inside the building.
  - (2) One (1) Plastic Granulator, identified as Unit #3-2, constructed in 2019, for small-scale size reduction of clean plastic scrap, with a maximum throughput capacity of 4,000 pounds of plastic per hour, equipped with an Air Elutriation System, identified as Unit #2-3, for classifying ground plastic, dust and fines, with the scrap being separated by one (1) cyclone and exhausting into a baghouse, which exhausts inside the building.
- (z) One (1) Plastic Granulator, identified as Grinder #3-1, constructed in 2019, for small-scale size reduction of clean plastic scrap, with a maximum throughput capacity of 1,200 pounds of plastic per hour, controlled by one (1) cyclone and exhausting inside the building.

**Material Handling and Conveying**

- (aa) Material handling and conveying operations, identified as SAP conveying, approved in 2019 for construction with a maximum throughput capacity of 50,000 pounds of material per hour, including: dumpers, conveyors, and bulk cargo containers (e.g., Gaylord Container Boxes), for the transfer of clean granulated plastics, raw materials, fines and dust, throughout the facility, uncontrolled and exhausting inside the building.

**Material Separation**

- (bb) One (1) Hamos Magnetic Separator, identified as Hamos, constructed in 2019, for separating two different types of plastic that are mixed together through electromagnetism, with a maximum throughput capacity of 1,500 pounds of plastic per hour, controlled by an Air Equipment and Engineering Teknican separator for dust removal, exhausting into a filter bag house, which exhausts inside the building.
- (cc) One (1) shaker table, identified as shaker #4, constructed in 2019, for separating extruded plastic pellets from improperly sized scrap, with a maximum throughput capacity of 3,000 pounds of plastic pellets per hour, each, uncontrolled and exhausting inside the building.
- (dd) One (1) Tank Sink Float line, identified as Sink Float, constructed in 2019, for the classification and separation of plastic pellets, with a maximum throughput capacity of 1,500 pounds of pellets per hour, uncontrolled and exhausting inside the building.

(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 [326 IAC 6.5-1-2]**

Pursuant to 326 IAC 6.5-1-2(a), particulate emissions from each of the following emission units shall not exceed the grain per dry standard cubic foot (dscf) limit listed in the table below:

<b>Emission Unit</b>	<b>PM Limit (grain/dscf)</b>
Shredder Unit #1-1	0.03
Granulator Unit #1-2	0.03
Shredder Unit #2-1	0.03
Granulator Unit #2-2	0.03
Shredder Unit #3-1	0.03
Granulator Unit #3-2	0.03
Grinder Unit #3-1	0.03
Hamos Magnetic Separator	0.03
Shaker #4	0.03
Material Handling and Conveying Operations	0.03

**D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan is required for these facilities and any 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.2.3 Particulate Control**

- (a) In order to assure compliance with Condition D.2.1, the cyclones, baghouses, Air Equipment and Engineering Teknican separator, centralized vacuum assisted cyclone,

and vacuum assisted air aspiration unit for particulate control of the granulators (Units #1-2, #2-2, #3-2), and Hamos Magnetic Separator, shall be in operation and control emissions from the granulators (Units #1-2, #2-2, #3-2), and Hamos Magnetic Separator, at all times when any of these emission units are in operation.

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

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

#### **D.2.4 Cyclone Failure Detection**

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In the event that a cyclone malfunction has been observed:

Failed units and the associated process will be shut down immediately until the failed units 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 emission 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).

#### **D.2.5 Broken or Failed Bag Detection - Baghouse/Filter**

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

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



**SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

**Equipment formerly located at Sam Jones Expressway Plant:**

**Food Container Line:**

- (ee) One (1) Trommel, identified as Trommel, approved in 2019 for construction, with a maximum capacity of 6.0 tons per hour, and exhausting indoors.
- (ff) One (1) Optical Sorter, identified as Optical Sorter, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (gg) Product Conveyors, identified as FL conveyors, each approved in 2019 for construction, with a maximum capacity of 1.0 tons per hour, and exhausting indoors.
- (hh) Two (2) Grinders, identified as Grinder #S1, and Grinder #S2, each approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, each, and exhausting indoors.
- (ll) One (1) Electric Spin Dryer, identified as Dryer #1, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (mm) One (1) Cyclone Separator, approved in 2019 for construction, with a maximum capacity of 3.0 tons per hour, and exhausting indoors.
- (nn) One (1) Agglomerator Process, identified as Agglomerator, approved in 2019 for construction, with a maximum capacity of 3.0 tons per hour, consisting of a receiving hopper vented to bag filters, an agglomerator, a grinder vented to bag filters, an aspirator that returns fines to the agglomerator auger vented to bag filters, and a bulk receiving hopper vented to bag filters. All bag filters exhaust indoors.
- (oo) One (1) Extruder, identified as Extruder, approved in 2019 for construction, with a maximum capacity of 3.0 tons per hour, and exhausting indoors.
- (rr) One (1) Log Shredder, identified as Log Shredder, approved in 2019 for construction, with a maximum capacity of 0.75 tons per hour of compressed foam, using no controls, and exhausting indoors.
- (ss) One (1) Shredder, identified as Pre-Shredder, approved in 2019 for construction, with a maximum capacity of 0.10 tons per hour of foam scrap, using no controls, and exhausting indoors.
- (tt) One (1) shaker table, identified as Shaker Table #7, approved in 2019 for construction, with a maximum throughput of 3.0 tons of pellets per hour, no control, and exhausting indoors.
- (uu) One (1) Gaylord loading, identified as loading, approved in 2019 for construction, with a maximum throughput of 3.0 tons of pellets per hour, no control, and exhausting indoors.

**Hanger Line:**

- (ww) One (1) Grinder, identified as Grinder #3, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.

- (xx) One (1) Cyclone Separator, identified as C1, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
  - (yy) One (1) Vibrating Screen, identified as Vibrating Screen, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
  - (zz) Product Conveyors, identified as HL conveyors, approved in 2019 for construction, with a maximum capacity of 1.0 tons per hour, and exhausting indoors.
  - (ddd) Two (2) Silos, identified as silos #1 and #2, each approved in 2019 for construction, with a combined maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

**D.3.1 VOC Emission Limitations and FESOP Minor Limits [326 IAC 8-1-6][326 IAC 2-8-4]**

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

- (a) The maximum source-wide polystyrene foam throughput shall not exceed 5,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The PM10, PM2.5, and VOC (from the Food Container Line), shall not exceed the pounds per ton of throughput noted in the table below:

Emission Unit	PM10 Limit (lb/ton)	PM2.5 Limit (lb/ton)	VOC Limit (lb/ton)
Trommel	0.0086	0.0086	-
Optical Sorter	0.0011	0.0011	-
Product Drop	0.0012	0.0012	-
Grinder #S1	0.063	0.063	10.0
Grinder #S2	0.063	0.063	10.0
Spin Dryer #1	-	-	1.25
Cyclone	0.63	0.63	-
Agglomerator Process	0.63	0.63	1.25
Extruder #1	-	-	1.25
Log Shredder	0.63	0.63	0.38
Pre-Shredder	0.003	0.003	-
Extruder #1 Spin Dryer	0.003	0.003	-
Shaker Table for Extruded Pellets	0.3	0.3	-
Extruded Pellets Pneumatically Conveyed to Storage Bin	0.00022	0.00022	-
Extruded Pellets Gravity Dropped to Gaylord Containers	0.003	0.003	-

Compliance with these limits shall limit VOC emissions from Grinder #S1 and Grinder #S2 to less than twenty-five (25) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 8-1-6 not applicable.

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

### D.3.2 HAP Minor Limits [40 CFR 63]

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In order to assure this source is an area source of HAPs under Section 112 of the Clean Air Act (CAA), the Permittee shall comply with the following:

- (a) The maximum polystyrene foam throughput for the Extruder #1 (Food Container Line) shall not exceed 5,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) Styrene emissions from Extruder #1 shall not exceed 3.0 pounds of styrene per ton of polystyrene.

Compliance with these limits, combined with the potential to emit styrene from all other emission units at this source, shall limit the source-wide total potential to emit styrene to less than ten (10) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable, and this source is an area source of HAP emissions under Section 112 of the Clean Air Act (CAA).

### D.3.3 Particulate [326 IAC 6.5-1-2]

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Pursuant to 326 IAC 6.5-1-2(a), particulate emissions from the Trommel, Optical Sorter, FL Conveyors, Grinder #S1, Grinder #S2, Cyclone, Log Shredder, Pre-shredder, each of the emission units comprising the Agglomerator Process, Grinder #3, Cyclone Separator, Silos #1 and #2, Vibrating Screen, and the HL Conveyors, shall each not exceed 0.03 grain per dry standard cubic foot (dscf).

### D.3.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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A Preventive Maintenance Plan is required for these facilities and any 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.3.5 Throughput Limit

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Compliance with the polystyrene foam throughput limit in Condition D.3.1(a) and Condition D.3.2, shall be determined by the following:

$$PSF_{Total} = \sum_{m=1}^{12} (PSF_{Extruded} / 0.97)$$

Where:

$PSF_{Total}$  = Total polystyrene foam processed by the food container line (tons per twelve (12) consecutive month period);

$PSF_{Extruded}$  = The amount of polystyrene foam produced by Extruder #1 (tons/month); and

$m$  = Each calendar month within the twelve (12) consecutive month period.

Note: In the equation above, the factor of 0.97 represents the presumed 3% weight loss of polystyrene foam due to the volatilization of VOCs prior to the extrusion process.

### D.3.6 Testing Requirements [326 IAC 2-1.1-11]

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- (a) Not later than 180 days after the startup of Grinder #1 or Grinder #2, Spin Dryer #1, the Agglomerator, and Extruder #1, the Permittee shall perform VOC testing of the exhaust from Grinder #S1 or Grinder #S2, Spin Dryer #1, the Agglomerator, and Extruder #1 utilizing methods approved by the commissioner to demonstrate compliance with Condition D.3.1(b) and to verify uncontrolled emission factors.

- (b) In order to demonstrate compliance with Conditions D.3.1(b), the Permittee shall perform VOC testing for Grinder #1, Grinder #2, Extruder #1, and the Agglomerator, utilizing methods as approved by the Commissioner 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 obligation with regard to the testing required by this condition.

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

#### **D.3.7 Record Keeping Requirement**

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- (a) To document the compliance status with Conditions D.3.1(a) and D.3.2(a), the Permittee shall maintain monthly records of the amount of polystyrene foam processed, as recorded at the outlet of Extruder #1, and as determined by the compliance equation in Condition D.3.5.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required to be maintained by this condition.

#### **D.3.8 Reporting Requirement**

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A quarterly report of the information to document the compliance status with D.3.1(a), D.3.2(a), and D.3.5, shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by these conditions. The report does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

**Existing Equipment:**

- (hhh) One (1) natural gas fired boiler, approved in 2019 for construction, with a maximum heat input capacity of 4.2 million Btu per hour (MMBtu/hr), exhausting to stack S2.
- (iii) One (1) force draft natural gas heater, identified as Q17, approved in 2019 for construction, with a maximum heat input capacity of 0.4 MM Btu/hr, exhausting to the atmosphere.
- (jjj) Four (4) natural gas heating generators, each approved in 2019 for construction, each with a maximum heat input capacity of 0.125 MM Btu/hr, exhausting to the atmosphere.
- (kkk) Eleven (11) force draft natural gas heaters, each approved in 2019 for construction, each with a maximum heat input capacity of 3.125 MM Btu/hr, exhausting to the atmosphere.

(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.4.1 Particulate [326 IAC 6.5-1-2]**

Pursuant to 326 IAC 6.5-1-2(a), particulate emissions from each of the following emission units shall not exceed the grain per dry standard cubic foot (dscf) limit listed in the table below:

Emission Unit	PM Limit (grain/dscf)
NG Boiler	0.03
Q17 Forced Draft NG Heater	0.03
NG Heating Generator	0.03
NG Heating Generator	0.03
NG Heating Generator	0.03
NG Heating Generator	0.03
NG Forced Draft Heater	0.03
NG Forced Draft Heater	0.03
NG Forced Draft Heater	0.03
NG Forced Draft Heater	0.03
NG Forced Draft Heater	0.03
NG Forced Draft Heater	0.03
NG Forced Draft Heater	0.03
NG Forced Draft Heater	0.03
NG Forced Draft Heater	0.03
NG Forced Draft Heater	0.03
NG Forced Draft Heater	0.03

**D.4.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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

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

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

Source Name: Plastics Recycling, Incorporated  
Source Address: 7601 Rockville Road, Indianapolis, Indiana 46206  
FESOP Permit No.: F097-40108-00789

**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: Plastics Recycling, Incorporated  
Source Address: 7601 Rockville Road, Indianapolis, Indiana 46206  
FESOP Permit No.: F097-40108-00789

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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**

**FESOP Quarterly Report**

Source Name: Plastics Recycling, Incorporated  
 Source Address: 7601 Rockville Road, Indianapolis, Indiana 46206  
 FESOP Permit No.: F097-40108-00789  
 Facility: Source-wide (Food Container Line)  
 Parameter: Polystyrene Foam Throughput  
 Limit: 5,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month, using the equation contained in Condition D.3.5 (included below).

$$PSF_{Total} = \sum_{m=1}^{12} (PSF_{Extruded} / 0.97)$$

Where:  
*PSF<sub>Total</sub>* = Total polystyrene foam processed by the food container line (tons per twelve (12) consecutive month period);  
*PSF<sub>Extruded</sub>* = The amount of polystyrene foam produced by Extruder #1 (tons/month); and  
*m* = Each calendar month within the twelve (12) consecutive month period.

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

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

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

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

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

Source Name: Plastics Recycling, Incorporated  
Source Address: 7601 Rockville Road, Indianapolis, Indiana 46206  
FESOP Permit No.: F097-40108-00789

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 New Source Construction and  
Federally Enforceable State Operating Permit (FESOP)**

**Source Description and Location**

**Source Name:** Plastics Recycling, Incorporated  
**Source Location:** 4601 Rockville Road, Indianapolis, IN 46206  
**County:** Marion (Wayne Township)  
**SIC Code:** 5093 (Scrap and Waste Materials)  
**Operation Permit No.:** F097-40108-00789  
**Permit Reviewer:** Daniel W. Pell

On June 7, 2018, the Office of Air Quality (OAQ) received an application from Plastics Recycling, Incorporated related to the construction and operation of a stationary plastic recycling plant.

**Existing Approvals**

There have been no previous approvals issued to this source.

**County Attainment Status**

The source is located in Marion County.

Pollutant	Designation
SO <sub>2</sub>	Non-attainment effective October 4, 2013, for the Center Township, Perry Township, and Wayne Township. Better than national standards for the remainder of the county.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 <sup>th</sup> Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
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>	Attainment effective July 11, 2013, 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> Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.	

\*These documents are incorporated by reference. Copies referenced in this section may be obtained from the Government Printing Office, 732 North Capitol Street NW, Washington, D.C. 20401 or are available for review and copying at the Indiana Department of Environmental Management, Office of Legal Counsel, Indiana Government Center-North, Thirteenth Floor, 100 North Senate Avenue, Indianapolis, Indiana 46204

- (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. Marion 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>**  
Marion 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) **SO<sub>2</sub>**  
U.S. EPA, in the Federal Register Notice 78 FR 47191 dated August 5, 2013, has designated Marion County (Wayne Township) as nonattainment for SO<sub>2</sub>. Therefore, SO<sub>2</sub> emissions were reviewed pursuant to the requirements of Emission Offset, 326 IAC 2-3.
- (d) **Other Criteria Pollutants**  
Marion County has been classified as attainment or unclassifiable in Indiana for all the 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.

### Background and Description of Permitted Emission Units and New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Plastics Recycling, Incorporated on June 7, 2018, relating to the consolidation of three permitted Indianapolis plants at a new location with the address of 7601 Rockville Road, Indianapolis, IN 46206. The three permitted plants are described as follows:

1. The original Plastics Recycling, Inc. Plant is located at 2015 South Pennsylvania Street, Indianapolis, IN.
2. A second plant is located at 1910 South State Street, Indianapolis, IN. Both of these existing plants are permitted under Minor Source Operating Permit M097-35443-00672.
3. Plastics Recycling 2, LLC, is located at 4434 Sam Jones Expressway and operates under Federally Enforceable State Operating Permit F097-35099-00739.

The resulting plant consolidation will be doing business as Plastic Recycling, Incorporated and will be operating under a Federally Enforceable State Operating Permit. This plant consolidation will be located at a site formerly occupied by Rexnord Industries, LLC.

The consolidated plant consists of the following permitted emission units:

#### **Equipment formerly located at Pennsylvania Street Plant:**

##### **Grinding**

- (a) One (1) plastic granulator, identified as Grinder #P1, approved in 2018 for construction, with a maximum throughput capacity of 1,000 pounds of plastic per hour, no control, and exhausting inside the building.
- (b) One (1) plastic granulator, identified as Grinder #P2, approved in 2019 for construction, with a maximum throughput capacity of 1,000 pounds of plastic per hour, no control, and exhausting inside the building.

##### **Mixing**

- (c) One (1) batch blender, identified as Master Batch Blender #1, approved in 2019 for construction, used for master batch blending of various types of granulated plastic, raw materials, and fines to create a blend of plastics that meet a required specification, with a maximum throughput capacity of 10,000 pounds of mixed plastics per hour, no control, and exhausting indoors.
- (d) One (1) batch blender, identified as Master Batch Blender #2, approved in 2019 for construction, used for master batch blending of various types of granulated plastic, raw materials, and fines to create a blend of plastics that meet a required specification, with a maximum throughput capacity of 6,000 pounds of plastics per hour, no control, and exhausting indoors.
- (e) One (1) batch blender, identified as Master Batch Blender #3, approved in 2019 for construction, used for master batch blending of various types of granulated plastic, raw materials, and fines to create a blend of plastics that meet a required specification, with a maximum throughput capacity of 6,000 pounds of plastics per hour, no control, and exhausting indoors.
- (f) One (1) batch blender, identified as Master Batch Blender #4, approved in 2019 for construction, used for master batch blending of various types of granulated plastic, raw materials, and fines to create a blend of plastics that meet a required specification, with a maximum throughput capacity of 6,000 pounds of plastics per hour, no control, and exhausting indoors.

#### **Extrusion Lines**

- (g) Extrusion Line #1 consisting of the following:
  - (1) One (1) small blender, identified as Extrusion Blender #1, approved in 2019 for construction, with a maximum throughput capacity of 3,000 pounds of mixed plastics per hour, feeding directly into Extruder #1, no control, exhausting indoors.
  - (2) One (1) plastic extruder, identified as Extruder #1, approved in 2019 for construction, with a maximum throughput capacity of 3,000 pounds of blended plastics per hour, controlled by a cyclone, identified as Cyclone #1, and exhausting indoors.
  - (3) One (1) shaker table, identified as Shaker Table #1, approved in 2019 for construction, with a maximum throughput of 3,000 pounds of blended plastics per hour, no control, and exhausting indoors.
- (h) Extrusion Line #2, consisting of the following:
  - (1) One (1) small blender, identified as Extrusion Blender #2, approved in 2019 for construction, with a maximum throughput capacity of 3,000 pounds of mixed plastics per hour, feeding directly into Extruder #2, no control, exhausting indoors.
  - (2) One (1) plastic extruder, identified as Extruder #2, approved in 2019 for construction, with a maximum throughput capacity of 2,000 pounds of blended plastics per hour, controlled by a cyclone, identified as Cyclone #2, and exhausting indoors.
  - (3) One (1) shaker table, identified as Shaker Table #2, approved in 2019 for construction, with a maximum throughput of 3,000 pounds of blended plastics per hour, no control, and exhausting indoors.
- (i) Extrusion Line #3, consisting of the following:
  - (1) One (1) small blender, identified as Extrusion Blender #3, approved in 2019 for construction, with a maximum throughput capacity of 3,000 pounds of mixed plastics per hour, feeding directly into Extruder #3, no control, exhausting indoors.

- (2) One (1) plastic extruder, identified as Extruder #3, approved in 2019 for construction, with a maximum throughput capacity of 2,500 pounds of blended plastics per hour, controlled by a cyclone, identified as Cyclone #3, and exhausting indoors.
  - (3) One (1) shaker table, identified as Shaker Table #3, approved in 2019 for construction, with a maximum throughput of 3,000 pounds of blended plastics per hour, no control, and exhausting indoors.
- (j) Extrusion Line #4, consisting of the following:
- (1) One (1) small blender, identified as Extrusion Blender #4, approved in 2019 for construction, with a maximum throughput capacity of 3,000 pounds of mixed plastics per hour, feeding directly into Extruder #4, no control, exhausting indoors.
  - (2) One (1) plastic extruder, identified as Extruder #4, approved in 2019 for construction, with a maximum throughput capacity of 2,500 pounds of blended plastics per hour, controlled by a cyclone, identified as Cyclone #4, and exhausting indoors.
  - (3) One (1) shaker table, identified as Shaker Table #4, approved in 2019 for construction, with a maximum throughput of 3,000 pounds of blended plastics per hour, no control, and exhausting indoors.
- (k) Extrusion Line #5
- (1) One (1) shredder, identified as Extrusion Shredder, approved in 2019 for construction, with a maximum throughput of 3,000 pounds of mixed plastics per hour, feeding directly into the Densifier.
  - (2) One (1) densifier, identified as Densifier, approved in 2019 for construction, used for small-scale size reduction of clean plastic scrap, mixing and agglomeration of various types of granulated plastic, raw materials, and fines to create a formula for a required specification, with a maximum throughput capacity of 2,500 pounds of plastic per hour, feeding directly into Extruder #5.
  - (3) One (1) plastic extruder, identified as Extruder #5, approved in 2019 for construction, with a maximum throughput capacity of 2,500 pounds of blended plastics per hour, controlled by a cyclone, identified as Cyclone #5, and exhausting indoors.
  - (4) One (1) shaker table, identified as Shaker Table #5, approved in 2019 for construction, with a maximum throughput of 3,000 pounds of blended plastics per hour, no control, and exhausting indoors.

**Other**

- (l) Material handling and conveying operations, approved in 2019 for construction, with a maximum throughput capacity of 100,000 pounds of material per hour. Includes:
- (1) Dumpers
  - (2) Hoppers
  - (3) Bulk Cargo Containers
  - (4) Conveyors
- for the transfer of clean granulated plastics, raw materials, fines and dust, throughout the facility, no control, and exhausting indoors.
- (m) One (1) guillotine cutter, identified as Guillotine #1, approved in 2019 for construction, for cutting large processed materials, such as rolls of sheets or large box-sized materials in half, with a

- maximum throughput of 5,000 pounds of plastic per hour, no control, and exhausting indoors.
- (n) Three (3) pneumatically-loaded, indoor silos for plastic pellet storage, each approved in 2019 for construction, each with a maximum storage capacity of 10,000 pounds; each with a loading/unloading rate of 1,000 pounds per hour; each using no control, and exhausting indoors.
  - (o) Two (2) pneumatically-loaded silos for final product storage, each approved in 2019 for construction, each with a maximum storage capacity of 240,000 pounds; each with a loading/unloading rate of 20,000 pounds per hour; and equipped with a common cyclone on top for silo loading, and exhausting outside the building.
  - (p) One (1) natural gas-fired bake off oven, identified as Oven, approved in 2019 for construction, to bake off the extrusion operations cutting dies, with a maximum heat input capacity of 2.3 MMBtu per hour, no control and exhausting inside the building.
  - (q) Pressurized storage tanks for the following:
    - (1) Liquid petroleum gas (LPG)
    - (2) Acetylene
    - (3) Compressed Oxygen
  - (r) Activities related to routine fabrication, maintenance and repair of buildings, structures, equipment or vehicles at the source where air emissions from those activities would not be associated with any commercial production process including the following:
    - (1) Blast-cleaning equipment using water as the suspension agent and associated equipment, including; one (1) LP gas powered heated pressure washer.
    - (2) Lubrication, including hand-held spray can lubrication, dipping metal parts into lubricating oil, and manual or automated addition of cutting oil in machining operations.
    - (3) Painting, including interior and exterior painting of buildings, and solvent use excluding degreasing operations utilizing halogenated organic solvents.
  - (s) The use of cleaners and solvents, to maintain production equipment, characterized as:
    - (1) having a vapor pressure equal to or less than two (2) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pound per square inch) measured at thirty-eight degrees Centigrade (38°C) (one hundred (100) degrees Fahrenheit); or
    - (2) having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty degrees Centigrade (20°C) (sixty-eight (68) degrees Fahrenheit);the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months.
  - (t) Portable VOC and HAP storage containers used for the collection, storage, or disposal of materials provided the container capacity is equal to or less than forty-six hundredths (0.46) cubic meters and the container is closed except when the material is added or removed, including:
    - (1) Lubricating oils
    - (2) Hydraulic oils
    - (3) Machining oils
    - (4) Machining fluids
  - (u) Hand-held, aerosol, spray can applications of adhesive to affix shipping labels onto outgoing



product containers.

- (v) Two (2) air compressors.

**Equipment formerly located at State Avenue Plant:**

**Plastic Shredding, Grinding, and Granulation**

- (w) One (1) Shredder/Granulator System, identified as Shredder #1, for size reduction of large plastic scrap into pieces small enough to be processed in the pelletizing lines, with a maximum throughput capacity of 4,000 pounds of plastic per hour, and including:
  - (1) One (1) Shredder, identified as Unit #1-1, constructed in 2019, for large-scale size reduction of clean plastic scrap, equipped with a conveyor to route resized material to the Granulator, Unit #1-2, uncontrolled and exhausting inside the building.
  - (2) One (1) Granulator, identified as Unit #1-2, constructed in 2019, for small-scale size reduction of clean plastic scrap, equipped with an Air Elutriation System, identified as Unit #1-3, for classifying ground plastic, dust and fines; with the scrap being separated by one (1) cyclone and exhausting into a baghouse, which exhausts inside the building.
- (x) One (1) Shredder/Granulator System, identified as Shredder #2, for size reduction of large plastic scrap into pieces small enough to be processed in the pelletizing lines, with a maximum throughput capacity of 4,000 pounds of plastic per hour, and including:
  - (1) One (1) Shredder, identified as Unit #2-1, constructed in 2019, for large-scale size reduction of clean plastic scrap, equipped with a conveyor to route resized material to the Plastic Granulator, Unit #2-2, uncontrolled and exhausting inside the building.
  - (2) One (1) Plastic Granulator, identified as Unit #2-2, constructed in 2019, for small-scale size reduction of clean plastic scrap, with a maximum throughput capacity of 4,000 pounds of plastic per hour, equipped with an Air Elutriation System, identified as Unit #2-3, for classifying ground plastic, dust and fines, with the scrap being separated by one (1) cyclone and exhausting into a baghouse, which exhausts inside the building.
- (y) One (1) Shredder/Granulator System, identified as Shredder #3, for size reduction of large plastic scrap into pieces small enough to be processed in the pelletizing lines, with a maximum throughput capacity of 4,000 pounds of plastic per hour, and including:
  - (1) One (1) Shredder, identified as Unit #3-1, constructed in 2019, for large-scale size reduction of clean plastic scrap, equipped with a conveyor to route resized material to the Plastic Granulator, Unit #3-2, uncontrolled and exhausting inside the building.
  - (2) One (1) Plastic Granulator, identified as Unit #3-2, constructed in 2019, for small-scale size reduction of clean plastic scrap, with a maximum throughput capacity of 4,000 pounds of plastic per hour, equipped with an Air Elutriation System, identified as Unit #2-3, for classifying ground plastic, dust and fines, with the scrap being separated by one (1) cyclone and exhausting into a baghouse, which exhausts inside the building.
- (z) One (1) Plastic Granulator, identified as Grinder #3-1, constructed in 2019, for small-scale size reduction of clean plastic scrap, with a maximum throughput capacity of 1,200 pounds of plastic per hour, controlled by one (1) cyclone and exhausting inside the building.

**Material Handling and Conveying**

- (aa) Material handling and conveying operations, identified as SAP conveying, approved in 2019 for

construction with a maximum throughput capacity of 50,000 pounds of material per hour, including: dumpers, conveyors, and bulk cargo containers (e.g., Gaylord Container Boxes), for the transfer of clean granulated plastics, raw materials, fines and dust, throughout the facility, uncontrolled and exhausting inside the building.

### **Material Separation**

- (bb) One (1) Hamos Magnetic Separator, identified as Hamos, constructed in 2019, for separating two different types of plastic that are mixed together through electromagnetism, with a maximum throughput capacity of 1,500 pounds of plastic per hour, controlled by an Air Equipment and Engineering Teknican separator for dust removal, exhausting into a filter bag house, which exhausts inside the building.
- (cc) One (1) shaker table, identified as shaker #4, constructed in 2019, for separating extruded plastic pellets from improperly sized scrap, with a maximum throughput capacity of 3,000 pounds of plastic pellets per hour, each, uncontrolled and exhausting inside the building.
- (dd) One (1) Tank Sink Float line, identified as Sink Float, constructed in 2019, for the classification and separation of plastic pellets, with a maximum throughput capacity of 1,500 pounds of pellets per hour, uncontrolled and exhausting inside the building.

### **Equipment formerly located at Sam Jones Expressway Plant:**

#### **Food Container Line:**

- (ee) One (1) Trommel, identified as Trommel, approved in 2019 for construction, with a maximum capacity of 6.0 tons per hour, and exhausting indoors.
- (ff) One (1) Optical Sorter, identified as Optical Sorter, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (gg) Product Conveyors, identified as FL conveyors, each approved in 2019 for construction, with a maximum capacity of 1.0 tons per hour, and exhausting indoors.
- (hh) Two (2) Grinders, identified as Grinder #S1, and Grinder #S2, each approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, each, and exhausting indoors.
- (ii) Four (4) Attrition Washers, identified as Attrition Washer 1 through Attrition Washer 4, each approved in 2019 for construction, each with a maximum capacity of 0.5 tons per hour, and exhausting indoors.
- (jj) One (1) Rinse and Dewatering Operation, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (kk) One (1) Float/Sink Tank, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (ll) One (1) Electric Spin Dryer, identified as Dryer #1, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (mm) One (1) Cyclone Separator, approved in 2019 for construction, with a maximum capacity of 3.0 tons per hour, and exhausting indoors.
- (nn) One (1) Agglomerator Process, identified as Agglomerator, approved in 2019 for construction, with a maximum capacity of 3.0 tons per hour, consisting of a receiving hopper vented to bag filters, an agglomerator, a grinder vented to bag filters, an aspirator that returns fines to the

agglomerator auger vented to bag filters, and a bulk receiving hopper vented to bag filters. All bag filters exhaust indoors.

- (oo) One (1) Extruder, identified as Extruder, approved in 2019 for construction, with a maximum capacity of 3.0 tons per hour, and exhausting indoors.
- (pp) One (1) Pelletizer, identified as Pelletizer, approved in 2019 for construction, with a maximum capacity of 1.0 tons per hour, and exhausting indoors.
- (qq) Three (3) Packaging operations, each approved in 2019 for construction, one with a maximum capacity of 1.5 tons per hour and two with a maximum capacity of 1.0 tons per hour, and exhausting indoors.
- (rr) One (1) Log Shredder, identified as Log Shredder, approved in 2019 for construction, with a maximum capacity of 0.75 tons per hour of compressed foam, using no controls, and exhausting indoors.
- (ss) One (1) Shredder, identified as Pre-Shredder, approved in 2019 for construction, with a maximum capacity of 0.10 tons per hour of foam scrap, using no controls, and exhausting indoors.
- (tt) One (1) shaker table, identified as Shaker Table #7, approved in 2019 for construction, with a maximum throughput of 3.0 tons of pellets per hour, no control, and exhausting indoors.
- (uu) One (1) Gaylord loading, identified as loading, approved in 2019 for construction, with a maximum throughput of 3.0 tons of pellets per hour, no control, and exhausting indoors.

**Hanger Line:**

- (vv) One (1) Electric Shredder, identified as Shredder, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (ww) One (1) Grinder, identified as Grinder #3, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (xx) One (1) Cyclone Separator, identified as C1, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (yy) One (1) Vibrating Screen, identified as Vibrating Screen, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (zz) Product Conveyors, identified as HL conveyors, approved in 2019 for construction, with a maximum capacity of 1.0 tons per hour, and exhausting indoors.
- (aaa) Four (4) Water Tanks, identified as Wash Tank #1 through Wash Tank #4, each approved in 2019 for construction, with a combined maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (bbb) Four (4) Hydroclones, identified as HC #1 through HC #4, each approved in 2019 for construction, with a combined maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (ccc) Two (2) Electric Dryer/Separators, identified as Spin dryers #3 and #4, each approved in 2019 for construction, with a combined maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (ddd) Two (2) Silos, identified as silos #1 and #2, each approved in 2019 for construction, with a combined maximum capacity of 2.0 tons per hour, and exhausting indoors.

- (eee) One (1) Color Sorter, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (fff) One (1) Electric Spin Dryer, identified as Dryer #5, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.
- (ggg) One (1) Packaging Operation, identified as HL Packaging, approved in 2019 for construction, with a maximum capacity of 2.0 tons per hour, and exhausting indoors.

**Existing Equipment:**

- (hhh) One (1) natural gas fired boiler, approved in 2019 for construction, with a maximum heat input capacity of 4.2 million Btu per hour (MMBtu/hr), exhausting to stack S2.
- (iii) One (1) force draft natural gas heater, identified as Q17, approved in 2019 for construction, with a maximum heat input capacity of 0.4 MM Btu/hr, exhausting to the atmosphere.
- (jjj) Four (4) natural gas heating generators, each approved in 2019 for construction, each with a maximum heat input capacity of 0.125 MM Btu/hr, exhausting to the atmosphere.
- (kkk) Eleven (11) force draft natural gas heaters, each approved in 2019 for construction, each with a maximum heat input capacity of 3.125 MM Btu/hr, exhausting to the atmosphere.
- (lll) One (1) soil and groundwater remediation system (air sparging, air stripping, soil vapor extraction), approved in 2019 for construction, consisting of soil vapor extraction well, sparging well, low profile air stripper, identified as Emissions Unit AS-1, with maximum air flow capacity of 300 acfm, and a maximum water flow rate of thirty (30) gallons per hour, and soil-vapor extraction (SVE) blower, identified as Emission Unit SVE-1, with maximum air flow capacity of 100 acfm, exhausting to R-1.
- (mmm) Paved Roads.

**Enforcement Issues**

There are no pending enforcement actions related to this source.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – FESOP**

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	> 100
PM10 <sup>(1)</sup>	> 100
PM2.5 <sup>(1)</sup>	> 100
SO <sub>2</sub>	< 100
NO <sub>x</sub>	< 100
VOC	> 100
CO	< 100

- (1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Styrene (Single Worst HAP)	11.94
<b>TOTAL HAPs</b>	<b>14.06</b>

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(30)) of PM10, PM2.5, and VOC are each greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(30)) of any single HAP is greater than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a FESOP (326 IAC 2-8), because the source will limit emissions of HAPs to less than the Title V major source threshold levels.

<b>PTE of the Entire Source After Issuance of the FESOP</b>
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The table below summarizes the potential to emit of the entire source after issuance of this FESOP, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM10*	PM2.5*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Relocated Pennsylvania Street Emission Units									
Grinding and Shredding	3.83	3.83	3.83	0	0	0	0	0	0
Blending	56.56	26.28	26.28	0	0	0	0	0	0
Extrusion	2.19	2.19	2.19	0	0	12.00	0	9.77	8.0 (Styrene)
Shaker Tables (Screening)	9.86	9.86	9.86	0	0	0	0	0	0
Material Handling	3.94	3.94	3.94	0	0	0	0	0	0
Three Silos-Loading (Plastic Pellet Storage)	0.28	0.28	0.28	0	0	0	0	0	0
Two Silos-Loading (Final Product Storage)	3.78	3.78	3.78	0	0	0	0	0	0
NG Bake-Off Oven	0.02	0.08	0.08	0.01	0.99	0.05	0.83	0.02	0.02 (Hexane)
Miscellaneous VOC	0.00	0.00	0.00	0	0	0.14	0	0.004	0.004 (Hexane)
Relocated State Avenue Emission Units									
Shredding and Granulation	19.32	19.32	19.32	0	0	0	0	0	0
Shaker Tables (Screening)	1.25	1.25	1.25	0	0	0	0	0	0
Material Handling (SAP)	1.31	1.31	1.31	0	0	0	0	0	0
Hamos Magnetic Separator	0.14	0.14	0.14	0	0	0	0	0	0
Relocated Sam Jones Expressway Emission Units									
Food Container Line	5.74	5.67	5.67	0	0	50.63	0	0.75	0.75 (Styrene)
Hanger Line	9.96	9.96	9.96	0	0	0	0	0	0
Rexnord Facility Emission Units									
NG Combustion Units	0.32	1.29	1.29	0.10	16.95	0.93	14.24	0.32	0.31 (Hexane)
Soil / Groundwater Remediation	0	0	0	0	0	0.03	0	0.005	0.004 (Carbon Tetrachloride)
<b>Total PTE of Entire Source</b>	<b>114.51</b>	<b>89.19</b>	<b>89.19</b>	<b>0.11</b>	<b>17.94</b>	<b>63.79</b>	<b>15.07</b>	<b>10.86</b>	<b>8.75 (Styrene)</b>
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds**	250	250	250	-	250	250	250	-	-
Emission Offset/ Nonattainment NSR Major Source Thresholds	-	-	-	100	-	-	-	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant".									

(a) FESOP Status

This new source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this new source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

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

Food Container Line:

- (1) The maximum source-wide polystyrene foam throughput shall not exceed 5,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (2) Styrene emissions from Extruder #1 shall not exceed 3.0 pounds of styrene per ton of polystyrene.
- (3) The PM, PM10, PM2.5, and VOC (from the Food Container Line), shall not exceed the pounds per ton of throughput noted in the table below:

Emission Unit	PM10 Limit (lb/ton)	PM2.5 Limit (lb/ton)	VOC Limit (lb/ton)
Trommel	0.0086	0.0086	-
Optical Sorter	0.0011	0.0011	-
Product Drop	0.0012	0.0012	-
Grinder #S1	0.063	0.063	10.0
Grinder #S2	0.063	0.063	10.0
Spin Dryer #1	-	-	1.25
Cyclone	0.63	0.63	-
Agglomerator Process	0.63	0.63	1.25
Extruder #1	-	-	1.25
Log Shredder	0.63	0.63	0.38
Pre-Shredder	0.003	0.003	-
Extruder #1 Spin Dryer	0.003	0.003	-
Shaker Table for Extruded Pellets	0.3	0.3	-
Extruded Pellets Pneumatically Conveyed to Storage Bin	0.00022	0.00022	-
Extruded Pellets Gravity Dropped to Gaylord Containers	0.003	0.003	-

Compliance with these limits shall limit VOC emissions from Grinder #S1 and Grinder #S2 to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 not applicable.

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

Compliance with these limits, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit Styrene to less than ten (10) tons per 12 consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

- (b) PSD Minor Source  
This new source is not a major stationary source, under PSD (326 IAC 2-2), because:
- (1) The potential to emit VOC is limited to less than 250 tons per year,
  - (2) The potential to emit all other PSD regulated pollutants are less than 250 tons per year,
  - (3) This source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (c) Emission Offset Minor Source  
This existing source is not a major stationary source, under Emission Offset (326 IAC 2-3), because the potential to emit SO<sub>2</sub> is less than 100 tons per year and the potential to emit all other nonattainment regulated pollutants are less than 100 tons per year. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.
- (d) GHGs  
On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146\\_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

<b>Federal Rule Applicability Determination</b>
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**New Source Performance Standards (NSPS)**

- (a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, are not included in the permit for natural gas-fired boiler. This rule applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr. The natural gas-fired boiler has a maximum heat input capacity of 4.2 MMBtu/hr.
- (b) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit for the emission units listed below, since these emission units are not steam generating units:
- (1) One (1) force draft natural gas heater, identified as Q17, installed in 1999, each with a maximum heat input capacity of 0.4 MM Btu/hr, exhausting to the atmosphere.
  - (2) Four (4) natural gas heating generators, installed in 1999, each with a maximum heat input capacity of 0.125 MM Btu/hr, exhausting to the atmosphere.
  - (3) Eleven (11) force draft natural gas heaters, installed in 1999, each with a maximum heat input capacity of 3.125 MM Btu/hr, exhausting to the atmosphere.



- (c) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit for the natural gas-fired bake off oven, since the bake off oven is not a steam generating unit.
- (d) The requirements of the New Source Performance Standard for Commercial and Industrial Solid Waste Incineration Units for Which Construction is Commenced after November 30, 1999, or for Which Modification or Reconstruction is Commenced after June 1, 2001, 40 CFR 60, Subpart CCCC (326 IAC 12), are not included in the permit since the natural gas-fired bake off oven does not meet all three requirements identified in 40 CFR 60.2010 because the bake off oven is defined as a burn-off oven in 40 CFR 60.2265 and pursuant to 40 CFR 60.2265, burn-off ovens are not commercial and industrial solid waste incineration units.
- (e) The requirements of the New Source Performance Standard for Commercial and Industrial Solid Waste Incineration Units for Which Construction is Commenced on or Before November 30, 1999, 40 CFR 60, Subpart DDDD (326 IAC 12), are not included in the permit since the natural gas-fired bake off oven is defined as a burn-off oven in 40 CFR 60.2875 and pursuant to 40 CFR 60.2875, burn-off ovens are not commercial and industrial solid waste incineration units.
- (f) The requirements of the New Source Performance Standard for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry, 40 CFR 60, Subpart DDD (326 IAC 12), are not included in the permit, since this source does not manufacture polypropylene, polyethylene, polystyrene, or poly (ethylene terephthalate) as defined in 60.561.
- (g) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

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

- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Site Remediation, 40 CFR 63, Subpart GGGGG (326 IAC 20), are not included in the permit for the Soil / Groundwater Remediation since the source is not a major source of HAP emissions.
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ and 326 IAC 20, are not applicable to the natural gas-fired boiler because although this source is an area source, this emission unit meets the definition of a natural gas-fired boiler. Pursuant to 40 CFR 63.11195(e), the natural gas-fired steam boiler, is exempt from this rule.
- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD, is not applicable to the boiler at this source, because this source is an area source for HAPs.
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Polyvinyl Chloride and Copolymers Production, 40 CFR 63, Subpart J (326 IAC 20-69), are not included in the permit, since this source is not a major source of HAPs, and does not meet the definition of a polyvinyl chloride (PVC) plant, as defined in 40 CFR 61.61(c).
- (l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Group I Polymers and Resins, 40 CFR 63, Subpart U (326 IAC 20-19), are not included in the permit, since this source is not a major source of HAPs, and does not manufacture an elastomer product, as defined in 40 CFR 63.482.
- (m) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for

- Epoxy Resins Production and Non-Nylon Polyamides Production, 40 CFR 63, Subpart W (326 IAC 20-20), are not included in the permit, since this source is not a major source of HAPs, and does not manufacture basic liquid epoxy resins (BLR) and/or wet strength resins (WSR), as defined in 40 CFR 63.522.
- (n) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Flexible Polyurethane Foam Production, 40 CFR 63, Subpart III (326 IAC 20-22), are not included in the permit, since this source is not a major source of HAPs, and does not produce flexible polyurethane or rebond foam, as defined in 40 CFR 63.1292.
  - (o) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Group IV Polymers and Resins, 40 CFR 63, Subpart JJJ (326 IAC 20-21), are not included in the permit, since this source is not a major source of HAPs, and does not manufacture thermoplastic products, as defined in 40 CFR 63.1312.
  - (p) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Polyether Polyols Production, 40 CFR 63, Subpart PPP (326 IAC 20-59), are not included in the permit, since this source is not a major source of HAPs, and does not manufacture polyether polyols, as defined in 40 CFR 63.1423.
  - (q) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW (326 IAC 20-25), are not included in the permit, since this source is not a major source of HAPs, and does not produce reinforced plastic composites, as defined in 40 CFR 63.5935.
  - (r) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Flexible Polyurethane Foam Fabrication Operations, 40 CFR 63, Subpart MMMMM (326 IAC 20-66), are not included in the permit, since this source is not a major source of HAPs, and does not fabricate flexible polyurethane foam, as defined in 40 CFR 63.1292.
  - (s) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Polyvinyl Chloride and Copolymers Production Area Sources, 40 CFR 63, Subpart DDDDDD, are not included in the permit, since this source does not produce polyvinyl chloride (PVC) or copolymers, as defined in 40 CFR 63.11144.
  - (t) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Flexible Polyurethane Foam Production and Fabrication Area Sources, 40 CFR 63, Subpart OOOOOO, are not included in the permit, since this source does not produce flexible polyurethane foam or rebond foam as defined in §63.1292, and is not a flexible polyurethane foam fabrication facility, as defined in 40 CFR 63.11419.
  - (u) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Manufacturers of Amino/Phenolic Resins, 40 CFR 63, Subpart OOO (326 IAC 20-58), are not included in the permit, since the source does not produce amino/phenolic resins, and the source is not a major source for HAPs.
  - (v) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Polyvinyl Chloride and Copolymers Production, 40 CFR 63, Subpart HHHHHHH, are not included in the permit, since the source does not own or operate one or more polyvinyl chloride and copolymers production process units (PVCPU) as defined in 63.12005, and the source is not a major source for HAPs.
  - (w) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD, (326 IAC 20-95), are not included in the permit, since the natural gas-fired space

heaters are not considered process heaters per the definition in 63.7575 and this source is not a major source of HAPs.

- (x) The requirements of the Emission Standards for Hazardous Air Pollutants (NESHAP) for National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ, are not included in this permit for the natural gas-fired space heaters, since these units are each not considered an industrial, commercial, or institutional boiler, as defined by 63.11237.
- (y) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

#### **Compliance Assurance Monitoring (CAM)**

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

<b>State Rule Applicability Determination - Entire Source</b>
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The following state rules are applicable to the source (not located at former Rexnord Plant):

- (a) **326 IAC 2-8-4 (FESOP)**  
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (b) **326 IAC 2-2 (Prevention of Significant Deterioration(PSD))**  
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) **326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**  
This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from each emission unit 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 thirty percent (30%) 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.

- (f) **326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**  
The source is not subject to 326 IAC 6-3-2 because pursuant to 326 IAC 6-3-1(c)(3), the requirements of 326 IAC 6-3 shall not apply if a particulate matter limitation that is as stringent as or more stringent than the particulate matter limitation established in this rule is established in 326 IAC 6.5 and 326 IAC 6.8. This source is subject to the requirements of 326 IAC 6.5. Therefore, the requirements of 326 IAC 6-3 are not applicable.
- (g) **326 IAC 6-4 (Fugitive Dust Emissions Limitations)**  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.
- (h) **326 IAC 6.5 (Particulate Matter Limitations Except Lake County)**  
326 IAC 6.5 applies to sources or facilities located in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne Counties. Sources specifically listed in the rule shall comply with the limitations in 326 IAC 6.5-2 through 326 IAC 6.5-10, as applicable. Sources not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10 shall comply with 326 IAC 6.5-1-2, if they have the potential to emit ten (10) tons or more of particulate matter (PM) and are not taking a limit of less than ten (10) tons of particulate matter (PM).  
  
This source, located in Marion County, has the potential to emit ten (10) tons or more of particulate matter (PM) and it is not taking a limit of less than ten (10) tons of particulate matter (PM). Therefore, 326 IAC 6.5 applies.
- (i) **326 IAC 6-5 (Particulate Matter Limitations Except Lake County)**  
Although the source is located in Marion County, pursuant to 326 IAC 6-5-1(a), the source must have potential fugitive particulate matter emissions of twenty-five (25) tons per year or more. The source does not have potential fugitive particulate matter emissions of twenty-five (25) tons per year or more.
- (j) **326 IAC 12 (New Source Performance Standards)**  
See Federal Rule Applicability Section of this TSD.
- (k) **326 IAC 20 (Hazardous Air Pollutants)**  
See Federal Rule Applicability Section of this TSD.

<b>State Rule Applicability Determination - Individual Facilities</b>
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The permitted emission units located at the Existing Plant:

**One (1) NG Boiler; One (1) Q17 Forced Draft NG Heater; Four (4) NG Heating Generators; and Eleven (11) NG Forced Draft Heaters**

**326 IAC 6-2 (Particulate Matter Emission Limitations for Sources of Indirect Heating)**

The requirements of 326 IAC 6-2 do not apply to the following emission units: One (1) natural gas-fired NG Boiler; One (1) Q17 Forced Draft NG Heater; Four (4) NG Heating Generators; and Eleven (11) NG Forced Draft Heaters, because these emission units are not sources of indirect heating.

**326 IAC 6.5 (Particulate Matter Limitations Except Lake County)**

As discussed in the State Rule Applicability - Entire Source, this source is subject to the requirements of 326 IAC 6.5. Pursuant to 326 IAC 6.5-1-2(a), the particulate matter (PM) emissions from each of the natural gas-fired combustion units shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

**326 IAC 7-1.1-1 (Sulfur Dioxide Emissions Limitations)**

The requirements of 326 IAC 7-1.1-1 do not apply to the following emission units: One (1) natural gas-fired NG Boiler; One (1) Q17 Forced Draft NG Heater; Four (4) NG Heating Generators; and Eleven (11) NG Forced Draft Heaters, because these natural gas-fired emission units, do not have the potential to emit twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide.

**326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**

The requirements of 326 IAC 8-1-6 do not apply to the following emission units: The natural gas-fired NG Boiler; One (1) Q17 Forced Draft NG Heater; Four (4) NG Heating Generators; and Eleven (11) NG Forced Draft Heaters, because the unlimited VOC potential emissions from these emission units are each less than twenty-five (25) tons per year.

**The relocated emission units from the Sam Jones Expressway Plant:**

**Food Container Line**

**326 IAC 6.5 (Particulate Matter Limitations Except Lake County)**

As discussed in the State Rule Applicability - Entire Source, this source is subject to the requirements of 326 IAC 6.5. Pursuant to 326 IAC 6.5-1-2(a), the PM emissions from the Trommel, Optical Sorter, conveyor and conveyor drop points, Grinder #S1, Grinder #S2, Cyclone, Log Shredder, Pre-Shredder, and Agglomerator/Hopper process shall each not exceed 0.03 grains per dry standard cubic foot (dscf).

**326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**

Pursuant to 326 IAC 8-1-6, this rule applies to new facilities (as of January 1, 1980) that have potential VOC emissions of twenty-five (25) tons or more per year, are located anywhere in the state, and are not otherwise regulated by other provisions of this article, 326 IAC 20-48, or 326 IAC 20-56.

Grinder #S1 and Grinder #S2 are considered a single facility for purposes of 326 IAC 8-1-6 applicability and have an unlimited potential to emit VOC emissions greater than twenty-five tons per year.

In order to render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable, the source shall comply with the following:

- (a) The maximum source-wide polystyrene foam throughput shall not exceed 5,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) VOC emissions from Grinder #S1 and Grinder #S2 shall not exceed 10.0 pounds of VOC per ton of polystyrene foam, each.

Compliance with these limits shall limit VOC emissions from Grinder #S1 and Grinder #S2 to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 8-1-6 not applicable.

**Hanger Line**

**326 IAC 6.5 (Particulate Matter Limitations Except Lake County)**

As discussed in the State Rule Applicability - Entire Source, this source is subject to the requirements of 326 IAC 6.5. Pursuant to 326 IAC 6.5-1-2(a), the PM emissions from the Grinder #3, Cyclone Separator, Silos #1 and #2, Vibrating Screen, and the Conveyors, shall each not exceed 0.03 grains per dry standard cubic foot (dscf).

**The relocated emission units from the Pennsylvania Street Plant:**

**Grinder #P1 and Grinder #P2**

**326 IAC 6.5 (Particulate Matter Limitations Except Lake County)**

As discussed in the State Rule Applicability - Entire Source, this source is subject to the requirements of 326 IAC 6.5. Pursuant to 326 IAC 6.5-1-2(a), the PM emissions from Grinder #P1 and Grinder #P2, shall each not exceed 0.03 grains per dry standard cubic foot (dscf).

**326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**

Pursuant to 326 IAC 8-1-6, this rule applies to new facilities (as of January 1, 1980) that have potential emissions of twenty-five (25) tons or more per year, are located anywhere in the state, and are not otherwise regulated by other provisions of this article, 326 IAC 20-48, or 326 IAC 20-56. The Grinder #P1 and the Grinder #P2, are not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from Grinder #P1 and Grinder #P2, are each less than twenty-five (25) tons per year.

**Extrusion Line #1 through Line #5**

(a) **326 IAC 6.5 (PM Limitations Except Lake County)**

As discussed in the State Rule Applicability - Entire Source, this source is subject to the following requirements of 326 IAC 6.5:

- (1) Pursuant to 326 IAC 6.5-1-2(a), the blenders, identified as Extrusion Blenders #1 through #4, are each subject to the particulate matter (PM) limit of 0.03 grains per dry standard cubic foot of exhaust gas (gr/dscf).
- (2) Pursuant to 326 IAC 6.5-1-2(a), the plastic extruders, identified as Extruders #1 through #5, are each subject to the particulate matter (PM) limit of 0.03 grains per dry standard cubic foot of exhaust gas (gr/dscf).
- (3) Pursuant to 326 IAC 6.5-1-2(a), the shaker tables, identified as Shaker Tables #1 through #5, are each subject to the particulate matter (PM) limit of 0.03 grains per dry standard cubic foot of exhaust gas (gr/dscf).
- (4) Pursuant to 326 IAC 6.5-1-2(a), the shredder, identified as Extrusion Shredder, is subject to the particulate matter (PM) limit of 0.03 grains per dry standard cubic foot of exhaust gas (gr/dscf).
- (5) Pursuant to 326 IAC 6.5-1-2(a), the Densifier is subject to the particulate matter (PM) limit of 0.03 grains per dry standard cubic foot of exhaust gas (gr/dscf).

(b) **326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**

Pursuant to 326 IAC 8-1-6, this rule applies to new facilities (as of January 1, 1980) that have potential emissions of twenty-five (25) tons or more per year, are located anywhere in the state, and are not otherwise regulated by other provisions of this article, 326 IAC 20-48, or 326 IAC 20-56. The Extrusion Blenders #1 through #4, the Extruders #1 through #5, the Shaker Tables #1 through #5, the Extrusion Shredder, and the Densifier, are not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.

**Master Batch Blender #1 through #4**

(a) **326 IAC 6.5 (PM Limitations Except Lake County)**

As discussed in the State Rule Applicability - Entire Source, this source is subject to the requirements of 326 IAC 6.5. Pursuant to 326 IAC 6.5-1-2(a), the batch blenders, identified as Master Batch Blenders #1 through #4, are each subject to the particulate matter (PM) limit of 0.03 grains per dry standard cubic foot of exhaust gas (gr/dscf).

**Material Handling and Conveying**

(a) **326 IAC 6.5 (PM Limitations Except Lake County)**

As discussed in the State Rule Applicability - Entire Source, this source is subject to the requirements of 326 IAC 6.5. Pursuant to 326 IAC 6.5-1-2(a), the material handling and conveying operation is subject to the particulate matter (PM) limit of 0.03 grains per dry standard cubic foot of exhaust gas (gr/dscf).

#### **Indoor Storage Silos and Final Product Storage Silos**

(a) **326 IAC 6.5 (PM Limitations Except Lake County)**

As discussed in the State Rule Applicability - Entire Source, this source is subject to the following requirements of 326 IAC 6.5:

- (1) Pursuant to 326 IAC 6.5-1-2(a), the three (3) Indoor Storage Silos are each subject to the particulate matter (PM) limit of 0.03 grains per dry standard cubic foot of exhaust gas (gr/dscf).
- (2) Pursuant to 326 IAC 6.5-1-2(a), the two (2) Final Product Storage Silos are each subject to the particulate matter (PM) limit of 0.03 grains per dry standard cubic foot of exhaust gas (gr/dscf).

#### **Natural Gas Combustion Unit (Bake-Off Oven)**

(a) **326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County)**

As discussed in the State Rule Applicability - Entire Source, this source is subject to the requirements of 326 IAC 6.5. Pursuant to 326 IAC 6.5-1-2(a), the natural gas-fired Bake-Off Oven is subject to the particulate matter (PM) limit of 0.03 grains per dry standard cubic foot of exhaust gas (gr/dscf).

(b) **326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)**

The natural gas-fired Bake-Off Oven is subject to a particulate matter limitation specified in 326 IAC 6.5 that is as stringent as or more stringent than the particulate limitation established in 326 IAC 6-2. Since 326 IAC 6.5-1-2 is applicable to the Bake-Off Oven, the requirements of 326 IAC 6-2 do not apply to the Bake-Off Oven.

(c) **326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)**

This source is not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide from the natural gas-fired Bake-Off Oven is less than twenty-five (25) tons per year and ten (10) pounds per hour.

(d) **326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**

Pursuant to 326 IAC 8-1-6, this rule applies to new facilities (as of January 1, 1980) that have potential emissions of twenty-five (25) tons or more per year, are located anywhere in the state, and are not otherwise regulated by other provisions of this article, 326 IAC 20-48, or 326 IAC 20-56. The natural gas-fired Bake-Off Oven is not subject to the requirements of 326 IAC 8-1-6 since the unlimited VOC potential emissions from the Bake-Off Oven is less than twenty-five (25) tons per year.

(e) **326 IAC 9-1-2 (Carbon Monoxide Emission Limits)**

The natural gas-fired Bake-Off Oven is subject to 326 IAC 9-1-2 (Carbon Monoxide Emission Limits) because this unit is a stationary source of carbon monoxide constructed after March 21, 1972, and it is considered to be a refuse incinerator and refuse burning equipment.

Pursuant to 326 IAC 9-1-2(a)(3) (Carbon Monoxide Emission Limits), the source shall not operate the natural gas-fired bake off oven unless the waste gas stream is burned in one (1) of the following:

- (1) Direct-flame afterburner; or
- (2) Secondary chamber.

(f) **326 IAC 4-2-2 (Incinerators)**

The natural gas-fired Bake-Off Oven is subject to the requirements of 326 IAC 4-2-2 because this oven meets the definition of an incinerator provided in 326 IAC 1-2-34 and is not subject to any of the rules identified in 326 IAC 4-2-1(b)(2). The Bake-Off Oven is used to remove plastic from the extrusion operations cutting dies. The plastic from the extrusion operations cutting dies is considered a solid waste.

**Cleaners and Miscellaneous VOC Sources**

(a) **326 IAC 8-3-2 (Organic Solvent Degreasing Operations)**

The cleaners and miscellaneous VOC sources used at this facility are applied by hand and do not use degreaser tanks for cleaning. These cleaning processes do not involve a cold cleaner degreaser tank, an open top vapor degreaser tank, or a conveyORIZED degreaser tank. Therefore, the requirements of 326 IAC 8-3-2 do not apply to the cleaning operations for the cleaners and miscellaneous VOC sources at this source since degreaser tanks are not used.

(b) **326 IAC 8-3-8 ((VOC) Material Requirements for Cold Cleaner Degreasers)**

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

The cleaners and miscellaneous VOC sources used at this facility are applied by hand and do not use degreaser tanks for cleaning. Therefore, the requirements of 326 IAC 8-3-8 do not apply to the cleaning operations for the cleaners and miscellaneous VOC sources at this source.

(c) **326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**

Pursuant to 326 IAC 8-1-6, this rule applies to new facilities (as of January 1, 1980) that have potential emissions of twenty-five (25) tons or more per year, are located anywhere in the state, and are not otherwise regulated by other provisions of this article, 326 IAC 20-48, or 326 IAC 20-56. The cleaners and miscellaneous VOC sources, are not subject to the requirements of 326 IAC 8-1-6 since the unlimited VOC potential emissions from each cleaner and miscellaneous VOC source is less than twenty-five (25) tons per year.

**The relocated emission units from the State Avenue Plant:**



#### **Plastic Shredding and Granulation**

(a) **326 IAC 6.5 (PM Limitations Except Lake County)**

As discussed in the State Rule Applicability - Entire Source, this source is subject to the following requirements of 326 IAC 6.5:

- (1) Pursuant to 326 IAC 6.5-1-2(a), the shredders, identified as Unit #1-1, #2-1, and #3-1 are each subject to the particulate matter (PM) limit of 0.03 grains per dry standard cubic foot of exhaust gas (gr/dscf).
- (2) Pursuant to 326 IAC 6.5-1-2(a), the granulators, identified as Unit #1-2, #2-2, #3-2, and Grinder #3-1 are each subject to the particulate matter (PM) limit of 0.03 grains per dry standard cubic foot of exhaust gas (gr/dscf).

#### **Material Separator and Shaker Table #4**

(a) **326 IAC 6.5 (PM Limitations Except Lake County)**

As discussed in the State Rule Applicability - Entire Source, this source is subject to the following requirements of 326 IAC 6.5:

- (1) Pursuant to 326 IAC 6.5-1-2(a), the Hamos Magnetic Separator is subject to the particulate matter (PM) limit of 0.03 grains per dry standard cubic foot of exhaust gas (gr/dscf).
- (2) Pursuant to 326 IAC 6.5-1-2(a), the shaker table, identified as shaker #4 is subject to the particulate matter (PM) limit of 0.03 grains per dry standard cubic foot of exhaust gas (gr/dscf).

#### **Material Handling and Conveying Operations (SAP)**

(a) **326 IAC 6.5 (PM Limitations Except Lake County)**

As discussed in the State Rule Applicability - Entire Source, this source is subject to the following requirement of 326 IAC 6.5:

- (1) Pursuant to 326 IAC 6.5-1-2(a), the material handling and conveying operations (SAP) are subject to the particulate matter (PM) limit of 0.03 grains per dry standard cubic foot of exhaust gas (gr/dscf).

<b>Compliance Determination, Monitoring and Testing Requirements</b>
--

- (a) There are no compliance monitoring requirements included in the permit.
- (b) The compliance determination requirements are as follows:

The source has stated that they cannot reasonably measure throughput of polystyrene foam for each emission unit (since polystyrene foam and rigid product are comingled at the start of the Food Container Line). Therefore, in order to demonstrate compliance with the throughput limits, the source proposes measuring the polystyrene foam throughput after the extruders since all rigid polystyrene has been removed prior to the extruders. The throughput limits will still be based on each individual emission unit. IDEM is conservatively assuming a 3% loss of VOC during the process. The polystyrene foam product at the extruder will be limited as follows:

- (1) Compliance with the polystyrene foam throughput limit for Grinders #S1 and Grinder #S2, Spin Dryer #1, Agglomerator/Hopper, and Extruder #1 shall be determined by the following:

$$PSF_{Total} = \sum_{m=1}^{12} (PSF_{Extruded} / 0.97)$$

Where:

$PSF_{Total}$  = Total polystyrene foam processed by the food container line (tons per twelve (12) consecutive month period);

$PSF_{Extruded}$  = The amount of polystyrene foam produced by Extruder 1 (tons/month); and

$m$  = Each calendar month within the twelve (12) consecutive month period.

Note: In the equation above, the factor of 0.97 represents the presumed 3% weight loss of polystyrene foam due to the volatilization of VOCs prior to the extrusion process.

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

Testing Requirements		
Emission Unit	Pollutant	Frequency of Testing
Grinder #S1 / Grinder #S2	VOC	Every five (5) years from most recent valid compliance demonstration
Spin Dryer #1		Every five (5) years from most recent valid compliance demonstration
Extruder #1 (formerly located at Sam Jones Expressway Plant PR2)		Every five (5) years from most recent valid compliance demonstration
Agglomerator/Hopper		Every five (5) years from most recent valid compliance demonstration

Testing is necessary in order to verify emission factors and to comply with 326 IAC 2-8 (FESOP).

Note: After the first five (5) year repeat testing has been completed, if the uncontrolled stack test results continue to demonstrate compliance with permit emission limits for the Spin Dryer #1, Extruder #1 and the Agglomerator/Hopper, the source may request the removal of the continued repeat testing requirements of these units.

### 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 June 7, 2018.

The operation of this source shall be subject to the conditions of the attached proposed FESOP No. F097-40108-00789. The staff recommends to the Commissioner that this FESOP be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Daniel W. Pell 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) 234-8532 or toll free at 1-800-451-6027 extension 4-8532.
- (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 Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations  
PTE Summary**

**Company Name:** Plastic Recycling, Incorporated  
**Address City IN Zip:** 7601 Rockville Road, Indianapolis, IN 46206  
**Permit No.:** F097-40108-00789  
**Reviewer:** Daniel W. Pell

<b>Uncontrolled Potential to Emit (tons/yr)</b>							
<b>Emission Unit</b>	<b>PM</b>	<b>PM10</b>	<b>PM2.5 *</b>	<b>SO<sub>2</sub></b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>
<b>Relocated Pennsylvania Street Emission Units</b>							
Grinding and Shredding	3.83	3.83	3.83	0	0	0	0
Blending	52.56	26.28	26.28	0	0	0	0
Extrusion	2.19	2.19	2.19	0	0	12.00	0
Shaker Tables (Screening)	9.86	9.86	9.86	0	0	0	0
Material Handling	3.94	3.94	3.94	0	0	0	0
Three Silos-Loading (Plastic Pellet Storage)	0.28	0.28	0.28	0	0	0	0
Two Silos-Loading (Final Product Storage)	3.78	3.78	3.78	0	0	0	0
NG Bake-Off Oven	0.02	0.08	0.08	0.01	0.99	0.05	0.83
Miscellaneous VOC	0	0	0	0	0	0.14	0
<b>Relocated State Avenue Emission Units</b>							
Shredding and Granulation	19.32	19.32	19.32	0	0	0	0
Shaker Tables (Screening)	1.25	1.25	1.25	0	0	0	0
Material Handling	1.31	1.31	1.31	0	0	0	0
Hamos Magnetic Separator	0.14	0.14	0.14	0	0	0	0
<b>Relocated Sam Jones Expressway Emission Units</b>							
Food Container Line	49.30	48.79	48.79	0	0	111.17	0
Hanger Line	9.96	9.96	9.96	0	0	0.00	0
<b>Rexnord Facility Emission Units</b>							
NG Combustion Units	0.32	1.29	1.29	0.10	16.95	0.93	14.24
Soil / Groundwater Remediation	0	0	0	0	0	0.03	0
<b>Total</b>	<b>158.08</b>	<b>132.30</b>	<b>132.30</b>	<b>0.11</b>	<b>17.94</b>	<b>124.33</b>	<b>15.07</b>
<b>Fugitive Emissions</b>							
Paved Roads	0.97	0.19	0.05	0	0	0	0

**Appendix A: Emission Calculations  
PTE Summary**

**Company Name:** Plastic Recycling, Incorporated  
**Address City IN Zip:** 7601 Rockville Road, Indianapolis, IN 46206  
**Permit No.:** F097-40108-00789  
**Reviewer:** Daniel W. Pell

<b>Potential to Emit After Control (tons/yr)</b>							
<b>Emission Unit</b>	<b>PM</b>	<b>PM10</b>	<b>PM2.5 *</b>	<b>SO<sub>2</sub></b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>
<b>Relocated Pennsylvania Street Emission Units</b>							
Grinding and Shredding	3.83	3.83	3.83	0	0	0	0
Blending	52.56	26.28	26.28	0	0	0	0
Extrusion	2.19	2.19	2.19	0	0	12.00	0
Shaker Tables (Screening)	9.86	9.86	9.86	0	0	0	0
Material Handling	3.94	3.94	3.94	0	0	0	0
Three Silos-Loading (Plastic Pellet Storage)	0.28	0.28	0.28	0	0	0	0
Two Silos-Loading (Final Product Storage)	3.78	3.78	3.78	0	0	0	0
NG Bake-Off Oven	0.02	0.08	0.08	0.01	0.99	0.05	0.83
Miscellaneous VOC	0	0	0	0	0	0.14	0
<b>Relocated State Avenue Emission Units</b>							
Shredding and Granulation	19.32	19.32	19.32	0	0	0	0
Shaker Tables (Screening)	1.25	1.25	1.25	0	0	0	0
Material Handling	1.31	1.31	1.31	0	0	0	0
Hamos Magnetic Separator	0.14	0.14	0.14	0	0	0	0
<b>Relocated Sam Jones Expressway Emission Units</b>							
Food Container Line	5.74	5.67	5.67	0	0	50.63	0
Hanger Line	9.96	9.96	9.96	0	0	0.00	0
<b>Rexnord Facility Emission Units</b>							
NG Combustion Units	0.32	1.29	1.29	0.10	16.95	0.93	14.24
Soil / Groundwater Remediation	0	0	0	0	0	0.03	0
<b>Total</b>	<b>114.51</b>	<b>89.19</b>	<b>89.19</b>	<b>0.11</b>	<b>17.94</b>	<b>63.79</b>	<b>15.07</b>
<b>Fugitive Emissions</b>							
Paved Roads	0.97	0.19	0.05	0	0	0	0

**Appendix A: Emission Calculations  
PTE Summary**

**Company Name:** Plastic Recycling, Incorporated  
**Address City IN Zip:** 7601 Rockville Road, Indianapolis, IN 46206  
**Permit No.:** F097-40108-00789  
**Reviewer:** Daniel W. Pell

Potential to Emit After Issuance (tons/yr)							
Emission Unit	PM	PM10	PM2.5 *	SO <sub>2</sub>	NOx	VOC	CO
<b>Relocated Pennsylvania Street Emission Units</b>							
Grinding and Shredding	3.83	3.83	3.83	0	0	0	0
Blending	52.56	26.28	26.28	0	0	0	0
Extrusion	2.19	2.19	2.19	0	0	12.00	0
Shaker Tables (Screening)	9.86	9.86	9.86	0	0	0	0
Material Handling	3.94	3.94	3.94	0	0	0	0
Three Silos-Loading (Plastic Pellet Storage)	0.28	0.28	0.28	0	0	0	0
Two Silos-Loading (Final Product Storage)	3.78	3.78	3.78	0	0	0	0
NG Bake-Off Oven	0.02	0.08	0.08	0.01	0.99	0.05	0.83
Miscellaneous VOC	0	0	0	0	0	0.14	0
<b>Relocated State Avenue Emission Units</b>							
Shredding and Granulation	19.32	19.32	19.32	0	0	0	0
Shaker Tables (Screening)	1.25	1.25	1.25	0	0	0	0
Material Handling	1.31	1.31	1.31	0	0	0	0
Hamos Magnetic Separator	0.14	0.14	0.14	0	0	0	0
<b>Relocated Sam Jones Expressway Emission Units</b>							
Food Container Line	5.74	5.67	5.67	0	0	50.63	0
Hanger Line	9.96	9.96	9.96	0	0	0.00	0
<b>Rexnord Facility Emission Units</b>							
NG Combustion Units	0.32	1.29	1.29	0.10	16.95	0.93	14.24
Soil / Groundwater Remediation	0	0	0	0	0	0.03	0
<b>Total</b>	<b>114.51</b>	<b>89.19</b>	<b>89.19</b>	<b>0.11</b>	<b>17.94</b>	<b>63.79</b>	<b>15.07</b>
<b>Fugitive Emissions</b>							
Paved Roads	0.97	0.19	0.05	0	0	0	0

negl. = negligible

\* PM2.5 listed is direct PM2.5

Note: The shaded cells indicate where limits are included.







**Appendix A: Emission Calculations  
PTE HAP Summary**

**Company Name:** Plastic Recycling, Incorporated  
**Address City IN Zip:** 7601 Rockville Road, Indianapolis, IN 46206  
**Permit No.:** F097-40108-00789  
**Reviewer:** Daniel W. Pell

Potential to Emit After Issuance (tons/yr)																							
Emission Unit	Aceto-phenone	Acrylo-nitrile	Cumene	Ethyl-benzene	Styrene	Benzene	Dichloro-benzene	Formalde-hyde	Hexane	Toluene	Lead	Cadmium	Chromium	Man-ganese	Nickel	Acetalde-hyde	Acrolein	Propion-aldehyde	Vinyl Chloride	Chloroform	Carbon Tetrachloride	Tetrachloro-ethylene	Total HAPs
<b>Relocated Pennsylvania Street Emission Units</b>																							
Grinding and Shredding	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00
Blending	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00
Extrusion	0.59	0.49	0.17	0.51	8.00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	9.77
Shaker Tables (Screening)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00
Material Handling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00
Three Silos-Loading (Plastic Pellet Storage)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00
Two Silos-Loading (Final Product Storage)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00
NG Bake-Off Oven	0	0	0	0	0	2.07E-05	1.19E-05	7.41E-04	0.02	3.36E-05	4.94E-06	1.086E-05	1.3827E-05	3.753E-06	2.074E-05	0	0	0	0	0	0	0	0.02
Miscellaneous VOC	0	0	0	0	0	0	0	0	0.004	0	0	0	0	0	0	0	0	0	0	0	0	0	0.004
<b>Relocated State Avenue Emission Units</b>																							
Shredding and Granulation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00
Shaker Tables (Screening)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00
Material Handling (SAP)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00
Hamos Magnetic Separator	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00
<b>Relocated Sam Jones Expressway Emission Units</b>																							
Food Container Line	0	0	0	0	0.75	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.75
Hanger Line	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00
<b>Rexnord Facility Emission Units</b>																							
NG Combustion Units	0	0	0	0	0	3.56E-04	2.03E-04	1.27E-02	0.31	5.8E-04	8.48E-05	1.9E-04	2.4E-04	6.441E-05	3.6E-04	0	0	0	0	0	0	0	0.32
Soil / Groundwater Remediation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	8.11E-04	6.76E-05	3.54E-03	6.76E-05	4.5E-03
<b>Total</b>	<b>0.59</b>	<b>0.49</b>	<b>0.17</b>	<b>0.51</b>	<b>8.75</b>	<b>0.00</b>	<b>0.00</b>	<b>0.01</b>	<b>0.33</b>	<b>6.1E-04</b>	<b>8.97E-05</b>	<b>2.0E-04</b>	<b>2.5E-04</b>	<b>6.8E-05</b>	<b>3.8E-04</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>8.1E-04</b>	<b>6.8E-05</b>	<b>3.5E-03</b>	<b>6.8E-05</b>	<b>10.86</b>
<b>Fugitive Emissions</b>																							
Paved Roads	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

negl. = negligible  
 \* PM2.5 listed is direct PM2.5  
 Note: The shaded cells indicate where limits are included.

**Appendix A: Emission Calculations**  
**PTE from Plastic Shredding, Grinding, and Granulation**

**Company Name:** Plastic Recycling, Incorporated  
**Address City IN Zip:** 7601 Rockville Road, Indianapolis, IN 46206  
**Permit No.:** F097-40108-00789  
**Permit Reviewer:** Daniel W. Pell

Emission Unit	Maximum Throughput Rate (lbs/hr)	Uncontrolled PM / PM10 / PM2.5 Emission Factor <sup>(1)</sup> (lbs/lbs)	Uncontrolled PTE PM / PM10 / PM2.5 * (lbs/hr)	Uncontrolled PTE of PM / PM10 / PM2.5 Emissions* (tons/yr)	Control Efficiency (%)	Controlled PTE PM / PM10 / PM2.5 * (lbs/hr)	Controlled PTE PM / PM10 / PM2.5 * (tons/yr)
<b>(formerly located at Pennsylvania Street Plant)</b>							
Granulator (Grinder #1)	1,000	1.75E-04	0.18	0.77	0%	NA	NA
Granulator (Grinder #2)	1,000	1.75E-04	0.18	0.77	0%	NA	NA
Extrusion Shredder	3,000	1.75E-04	0.53	2.30	0%	NA	NA
<b>Total</b>				<b>3.83</b>		NA	NA
<b>(formerly located at State Avenue Plant)</b>							
Shredder (Unit #1-1) $\alpha$	4,000	1.75E-04	0.70	3.07	0%	0.70	3.07
Granulator (Unit #1-2) $\beta$	4,000	1.75E-04	0.70	3.07	98%	0.01	0.06
Shredder (Unit #2-1) $\alpha$	4,000	1.75E-04	0.70	3.07	0%	0.70	3.07
Granulator (Unit #2-2) $\beta$	4,000	1.75E-04	0.70	3.07	98%	0.01	0.06
Shredder (Unit #3-1) $\alpha$	4,000	1.75E-04	0.70	3.07	0%	0.70	3.07
Granulator (Unit #3-2) $\beta$	4,000	1.75E-04	0.70	3.07	98%	0.01	0.06
Granulator (Grinder #3-1) $\beta$	1,200	1.75E-04	0.21	0.92	98%	0.00	0.02
<b>Total</b>				<b>19.32</b>		<b>2.15</b>	<b>9.40</b>

**METHODOLOGY**

Uncontrolled PTE (lbs/hr) = Max. Throughput Rate (lbs/hr) x Emission Factor (lbs/lbs)

Uncontrolled PTE (tons/yr) = Uncontrolled PTE (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs

Controlled PTE (lbs/hr) = Uncontrolled PTE (lbs/hr) \* (1 - Control Efficiency)

Controlled PTE (lbs/hr) for Granulator #2 = Uncontrolled PTE (lbs/hr) \* (1 - Control Efficiency of cyclone) \* (1 - Control Efficiency of baghouse)

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

Controlled PTE (tons/yr) for Granulator #2 = Uncontrolled PTE (tons/yr) \* (1 - Control Efficiency of cyclone) \* (1 - Control Efficiency of baghouse)

**NOTES**

Total emissions based on rated capacity of 8,760 hours/year.

There are no emission factors available in AP-42 or FIRE for plastic grinding process, therefore the following applies:

<sup>(1)</sup> The emission factor used to quantify emissions from the shredding and granulation operations is from AP-42 Fourth Edition, Volume 1, 1985, Table 10.3-1, and FIRE for SCC 30700802 (revoked 1/1/2002) for log sawing . The factor, presented in AP-42 and FIRE as 0.35 lb/ton, was converted as follows: EF (lbs/lb) = [0.35 lbs/ton \* 1ton/2000lbs].

\* In the absence of valid PM10 and PM 2.5 emission factors, these emissions are assumed equal to PM emissions.

Particulate emissions from these activities are controlled as follows:

$\alpha$  - The shredders are uncontrolled and vent inside the building

$\beta$  - Granulators are uncontrolled and vent inside of the building.

**Appendix A: Emission Calculations  
PTE from Blending Units**

**Company Name:** Plastic Recycling, Incorporated  
**Address City IN Zip:** 7601 Rockville Road, Indianapolis, IN 46206  
**Permit No.:** F097-40108-00789  
**Permit Reviewer:** Daniel W. Pell

Emission Unit	Max. Throughput Rate (lbs/hr)	PM Emission Factor (lbs/ton) <sup>(1)</sup>	PM emissions (lbs/hr)	Uncontrolled Potential to Emit (PTE) PM (tons/yr)	PM10 / PM2.5 Emission Factor (lbs/ton) <sup>(1)</sup>	PM10* emissions (lbs/hr)	Uncontrolled Potential to Emit (PTE) PM10 / PM2.5* (tons/yr)
<b>Pennsylvania Street</b>							
Extrusion Blender #1	3,000	0.60	0.90	3.94	0.30	0.45	1.97
Extrusion Blender #2	3,000	0.60	0.90	3.94	0.30	0.45	1.97
Extrusion Blender #3	3,000	0.60	0.90	3.94	0.30	0.45	1.97
Extrusion Blender #4	3,000	0.60	0.90	3.94	0.30	0.45	1.97
Master Batch Blender #1	10,000	0.60	3.00	13.14	0.30	1.50	6.57
Master Batch Blender #2	6,000	0.60	1.80	7.88	0.30	0.90	3.94
Master Batch Blender #3	6,000	0.60	1.80	7.88	0.30	0.90	3.94
Master Batch Blender #4	6,000	0.60	1.80	7.88	0.30	0.90	3.94
<b>Total</b>	<b>40,000</b>			<b>52.56</b>			<b>26.28</b>

**METHODOLOGY**

Hourly PM/PM10 PTE (lbs/hr) = Throughput Rate (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton)

Annual PM/PM10 PTE (tons/yr) = Max. Throughput Rate (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton) x 8760 hrs/yr x 1 ton/2000 lbs

**NOTES**

Total emissions based on rated capacity of 8,760 hours/year.

There are no emission factors available in AP-42 or FIRE for the blending/mixing of recycled plastics, therefore the following applies:

<sup>(1)</sup> The PM and PM10 emission factors are from WebFIRE for Fiberglass Manufacturing - Raw material: Mixing/Weighing (SCC 30501223).

\* In the absence of valid PM 2.5 emission factors, these emissions are assumed equal to PM10 emissions.

**Appendix A: Emission Calculations  
PTE PM and VOC from Extrusion Units**

**Company Name:** Plastic Recycling, Incorporated  
**Address City IN Zip:** 7601 Rockville Road, Indianapolis, IN 46206  
**Permit No.:** F097-40108-00789  
**Permit Reviewer:** Daniel W. Pell

Emission Unit	Max. Throughput Rate (lbs/hr)	PM Emission Factor (lbs/ton) <sup>(1)</sup>	Uncontrolled PTE PM / PM10 / PM2.5 (lbs/hr) *	Uncontrolled PM / PM10 / PM2.5 (tons/yr) *	VOC Emission Factor (lbs/ton) <sup>(1)</sup>	Uncontrolled PTE VOC (lbs/hr)	Uncontrolled PTE VOC (tons/yr)
<b>Pennsylvania Street</b>							
Extruder #1	3,000	0.07	0.10	0.45	0.38	0.57	2.48
Extruder #2	3,000	0.07	0.10	0.45	0.38	0.57	2.48
Extruder #3	3,000	0.07	0.10	0.45	0.38	0.57	2.48
Extruder #4	3,000	0.07	0.10	0.45	0.38	0.57	2.48
Extruder #5	2,500	0.07	0.09	0.38	0.38	0.47	2.07
<b>Total</b>	<b>14,500</b>		<b>0.50</b>	<b>2.19</b>		<b>2.74</b>	<b>12.00</b>

**METHODOLOGY**

Hourly PM/VOC PTE (lbs/hr) = Throughput Rate (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lbs/ton)

Annual PM/VOC PTE (tons/yr) = hourly PM/VOC emissions (lb/hr) x 8760 hrs/yr x 1 ton/2000 lbs

**NOTES**

1.0 ug/g (microgram per gram) =  $1.0 \times 10^{-6}$  lbs/lb or 1.0lb/10<sup>6</sup>lbs

Total emissions based on rated capacity of 8,760 hours/year.

<sup>(1)</sup> There are no emission factors available in AP-42 or FIRE for the extrusion of recycled plastics, therefore the following applies:

> The Emission factor for PM was taken from a technical paper published by the Journal of Air and Waste Management Association, titled "Development of Emission Factors for Polypropylene Processing" January 1999, Volume 49, Number 1. A melt temperature of 505 oF and reactor impact copolymer was used as the emission factor. The emission factor, reported as 34.5 ug/g (microgram per gram), was converted as follows:  $[34.5 \text{ (ug/g)} * (1.0 \times 10^{-6} \text{ (lbs/lb)} / 1.0 \text{ (ug/g)}) * (2000\text{lbs}/1\text{ton})] = 0.069 \text{ lbs/ton}$ .

> The emission factor for VOC was taken from a technical paper, published by the Journal of Air and Waste Management Association, titled "Sampling and Analysis of Volatile Organic Compounds Evolved During Thermal Processing of Acrylonitrile Butadiene Styrene Composite Resins", September 1995, Volume 45. The emission factor, reported as 189 ug/g (microgram per gram), was converted as follows:  $[189 \text{ (ug/g)} * (1.0 \times 10^{-6} \text{ (lbs/lb)} / 1.0 \text{ (ug/g)}) * (2000\text{lbs}/1\text{ton})] = 0.378 \text{ lbs/ton}$

\* In the absence of valid PM10 and PM 2.5 emission factors, these emissions are assumed equal to PM emissions.

**Appendix A: Emission Calculations  
PTE HAPs from Extrusion Units**

**Company Name:** Plastic Recycling, Incorporated  
**Address City IN Zip:** 7601 Rockville Road, Indianapolis, IN 46206  
**Permit No.:** F097-40108-00789  
**Permit Reviewer:** Daniel W. Pell

**HAP Emission Factors from Processing ABS**

HAP Constituent	CAS #	Emission Factor (lbs/10 <sup>6</sup> lbs)
Acetophenone	98-86-2	9.29
Acrylonitrile	107-13-1	7.79
Cumene (isopropylbenzene)	98-82-8	2.68
Ethylbenzene	100-41-4	8.02
Polystyrene	100-42-5	126

Emission Unit	Max Throughput Rate (lbs/hr)	Acetophenone Emissions (tons/yr)	Acrylonitrile Emissions (tons/yr)	Cumene Emissions (tons/yr)	Ethylbenzene Emissions (tons/yr)	Styrene Emissions (tons/yr)	
Extruder #1	3,000	0.12	0.10	3.52E-02	1.05E-01	1.66	
Extruder #2	3,000	0.12	0.10	3.52E-02	1.05E-01	1.66	
Extruder #3	3,000	0.12	0.10	3.52E-02	1.05E-01	1.66	
Extruder #4	3,000	0.12	0.10	3.52E-02	1.05E-01	1.66	
Extruder #5	2,500	0.10	0.09	2.93E-02	8.78E-02	1.38	<b>Total</b>
<b>Total</b>	14,500	<b>0.59</b>	<b>0.49</b>	<b>0.17</b>	<b>0.51</b>	<b>8.00</b>	<b>9.77</b>

**METHODOLOGY**

1.0 ug/g (microgram per gram) =  $1.0 \times 10^{-6}$  lbs/lb or 1.0lb/10<sup>6</sup>lbs

Annual HAPs Emissions (tons/yr) = (Max Throughput Rate (lbs resin/hr) \* Emission Factor (lbs/10<sup>6</sup> lbs) / 1000000) \* 8760 (hrs/yr) / 2000 (lbs/ton)

**NOTES**

There are no emission factors available in AP-42 or FIRE for the extrusion of recycled plastics, therefore the following applies:

<sup>(1)</sup> ABS plastic was chosen as worst case material for HAPs. Emission factors for HAPs from ABS were taken from the technical paper, "Sampling and Analysis of Volatile Organic Compounds Evolved During Thermal Processing of Acrylonitrile Butadiene Styrene Composite Resins" from Volume 45 of the Journal of Air and Waste Management

The emission factors were reported as ug/g (microgram per gram) and were converted as follows: EF (lb/10<sup>6</sup> lbs) = [EF (ug/g) \* (1.0lb/10<sup>6</sup> lbs) / 1.0 (ug/g)].

**Appendix A: Emission Calculations  
PTE from Material Screening**

**Company Name:** Plastic Recycling, Incorporated  
**Address City IN Zip:** 7601 Rockville Road, Indianapolis, IN 46206  
**Permit No.:** F097-40108-00789  
**Permit Reviewer:** Daniel W. Pell

Emission Unit	Maximum Throughput Rate (lbs/hr) <sup>(1)</sup>	Uncontrolled PM Emission Factor (lbs/lbs) <sup>(2)</sup>	Uncontrolled PM Emissions (lbs/hr)	Uncontrolled PTE of PM / PM10 / PM2.5 Emissions (tons/yr) *
<b>(Units relocated from Pennsylvania Street)</b>				
Material Screening (5 - Shaker Tables)	15,000	1.50E-04	2.25	9.86
<b>Total</b>				<b>9.86</b>
<b>(Unit relocated from State Avenue)</b>				
Material Screening (1 - Shaker Table)	1,900	1.50E-04	0.29	1.25
<b>Total</b>				<b>1.25</b>

**METHODOLOGY**

Uncontrolled PTE (lbs/hr) = Max. Throughput Rate (lbs/hr) x Emission Factor (lbs/lbs)

Uncontrolled PTE (tons/yr) = Uncontrolled PTE (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs

Shaker Tables = 5 tables x maximum throughput of 3,000 pounds of blended plastics per hour = 15,000 lbs/hr.

**NOTES**

Total emissions based on rated capacity of 8,760 hours/year.

Particulate emissions from the material handling and conveying activities are uncontrolled and vent inside the building.

<sup>(1)</sup> The maximum throughput rate (lbs/hr) of each of the shaker tables is limited by the maximum throughput capacity of the extrusion equipment.

<sup>(2)</sup> There are no emission factors available in AP-42 or FIRE for the screening of plastic materials, therefore the following applies:

The AP-42 emission factor for Crushed Stone Processing Operations: Fines Screening (SCC #3-05-020-21) has been used to develop a "worst case" estimate of emissions from the Screening (Shaker Table) activities.

The factor, presented in AP-42 and FIRE as 0.30 lb/ton, was converted as follows: EF (lbs/lb) = [0.30 lbs/ton \* 1ton/2000lbs].

\* In the absence of valid PM10 and PM 2.5 emission factors, these emissions are assumed equal to PM emissions.

This equipment is uncontrolled and vents inside the building.

**Appendix A: Emission Calculations  
PTE from Material Handling and Conveying**

**Company Name:** Plastic Recycling, Incorporated  
**Address City IN Zip:** 7601 Rockville Road, Indianapolis, IN 46206  
**Permit No.:** F097-40108-00789  
**Permit Reviewer:** Daniel W. Pell

Emission Unit	Maximum Throughput Rate (lbs/hr)	Uncontrolled PM <sup>(1)</sup> Emission Factor (lbs/ton)	Uncontrolled PM Emissions (lbs/hr) <sup>(2)</sup>	Uncontrolled Potential to Emit PM / PM10 / PM2.5 (tons/yr) <sup>(2)</sup>
<b>Material Handling and Conveying (formerly located at Pennsylvania Street Plant)</b>				
Three (3) Conveyors	100,000	0.003	0.45	1.97
Dumpers		0.003	0.15	0.66
Hoppers		0.003	0.15	0.66
Bulk Cargo Containers		0.003	0.15	0.66
<b>Total</b>				<b>3.94</b>
<b>Material Handling and Conveying (formerly located at State Avenue Plant)</b>				
Two (2) Conveyors	50,000	0.003	0.15	0.66
Dumpers		0.003	0.08	0.33
Bulk Cargo Containers		0.003	0.08	0.33
<b>Total</b>				<b>1.31</b>

**METHODOLOGY**

Uncontrolled PTE (lbs/hr) = Max. Throughput Rate (lbs/hr) x Emission Factor (lbs/ton) x (1 ton/2000 lbs)

Uncontrolled PTE (tons/yr) = Uncontrolled PTE (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs

**NOTES**

Particulate emissions from the material handling and conveying activities are uncontrolled and vent inside the building.

Total emissions based on rated capacity of 8,760 hours/year.

There are no emission factors for particulate available in AP-42 or FIRE for the handling and conveying of plastic materials.

<sup>(1)</sup> The PM emission factor for material handling is assumed to be 0.003 lb/ton. Source of assumed PM emission factor from: AP-42, Table 11.19.2-2 "Emission Factors for Crushed Stone Processing Operations", Conveyance Transfer Point (SCC 3-05-020-06) August 2004.

<sup>(2)</sup> In the absence of valid PM10 and PM 2.5 emission factors, these emissions are assumed equal to PM emissions.

**Appendix A: Emissions Calculations****PTE from Three (3) Pneumatically-Loaded, Indoor Plastic Pellet Storage Silos and Two (2) Pneumatically-Loaded Final Product Storage Silos**

**Company Name:** Plastic Recycling, Incorporated  
**Address City IN Zip:** 7601 Rockville Road, Indianapolis, IN 46206  
**Permit No.:** F097-40108-00789  
**Reviewer:** Daniel W. Pell

<b>Emission Unit (formerly located at Pennsylvania Street Plant)</b>	<b>Maximum Loading/Unloading Rate (lbs/hr)</b>	<b>PM / PM10 / PM2.5 Emission Factor (lbs/ton)</b>	<b>Uncontrolled PTE PM / PM10 / PM2.5 (tons/year)</b>
Three (3) Indoor Silos (Plastic Pellet Storage)	1,000	0.0432	0.28
Two (2) Silos Exhausting Outside (Final Product Storage)	20,000	0.0432	3.78

**Description:**

The Source states that the plastic pellet storage process uses no control and exhausts indoors.

The Source states that the final product storage process uses a cyclone on top of the silos which exhausts outside of the building.

No PM emission factors are available for granulated/ground plastic transfer points. Source of assumed PM emission factor from, "Report on the North Silo Particulate Test Program - Conducted for Smurfit Stone Container Corporation at their Facility Located in Schaumburg, Illinois", Report No. 2304, April 5, 2006.

In the absence of valid PM10 and PM 2.5 emission factors, these emissions are assumed equal to PM emissions.

**Methodology:**

Uncontrolled PTE (tons/year) = Loading/Unloading Rate (lb/hr) \* (1 ton/2000 lb) \* EF (lbs/lbs) \* 8760 hrs/yr \* (1 ton/2000 lb)



**Appendix A: Emissions Calculations**  
**PTE from Hamos Magnetic Separator**

**Company Name:** Plastic Recycling, Incorporated  
**Address City IN Zip:** 7601 Rockville Road, Indianapolis, IN 46206  
**Permit No.:** F097-40108-00789  
**Reviewer:** Daniel W. Pell

<b>Emission Unit</b>	<b>Maximum Process Rate (lbs plastic/hr)</b>	<b>PM / PM10 / PM2.5 Emission Factor (lbs/ton)</b>	<b>Uncontrolled PTE PM / PM10 / PM2.5 (tons/year)</b>
Hamos Magnetic Separator (formerly located at State Avenue Plant)	1,500	0.0432	0.14

**Description:**

No PM emission factors are available for granulated/ground plastic separation processes. Source of assumed PM emission factor from, "Report on the North Silo Particulate Test Program - Conducted for Smurfit Stone Container Corporation at their Facility Located in Schaumburg, Illinois", Report No. 2304, April 5, 2006.

In the absence of valid PM10 and PM 2.5 emission factors, these emissions are assumed equal to uncontrolled PM emissions.

The Hamos Magnetic Separator removes metal and separates two different types of plastic that have been generated in processes using electromagnetism.

**Methodology:**

Uncontrolled PTE (tons/year) = Loading/Unloading Rate (lb/hr) \* (1 ton/2000 lb) \* EF (lbs/lbs) \* 8760 hrs/yr \* (1 ton/2000 lb)

**Appendix A: Emissions Calculations  
PTE from One NG Bake-Off Oven  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name:** Plastic Recycling, Incorporated  
**Source Address:** 7601 Rockville Road, Indianapolis, IN 46206  
**Permit Number:** F097-40108-00789  
**Reviewer:** Daniel W. Pell

Heat Input Capacity MMBtu/hr	mmBtu mmscf	Potential Throughput MMCF/yr
2.3	1020	19.8

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.02	0.08	0.08	0.01	0.99	0.05	0.83

\*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

### Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
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	2.1E-05	1.2E-05	7.4E-04	0.02	3.4E-05	<b>0.02</b>

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
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	4.9E-06	1.1E-05	1.4E-05	3.8E-06	2.1E-05	<b>5.4E-05</b>
					<b>Total HAPs</b>	<b>0.02</b>
					<b>Worst HAP</b>	<b>0.02</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.

**Appendix A: Emission Calculations  
Miscellaneous Processes**

**Company Name:** Plastic Recycling, Incorporated  
**Address City IN Zip:** 7601 Rockville Road, Indianapolis, IN 46206  
**Permit No.:** F097-40108-00789  
**Permit Reviewer:** Daniel W. Pell

Material	Number of Cans Used Annually	Size of Can (fl oz)	Density (lb/gal)	Volume Used (gal/yr)	VOC Content (%)	PTE VOC (tons/yr)	PTE VOC (lbs/hr)	Total HAP (tons/yr)	Worst Case HAP
Adhesive	450	20	6.03	70.31	63.7%	0.135	0.031	-	
Penetrating Oil <sup>(1)</sup>	15	11	7.43	1.29	1.0%	4.787E-05	1.093E-05	-	
Cleaner <sup>(2)</sup>	24	11	5.59	2.06	70.0%	0.0040	0.00092	0.0040	Hexane
WD-40	15	12	6.76	1.41	49.5%	0.0024	0.00054	-	
<b>Total</b>						<b>0.141</b>	<b>0.032</b>		

**Methodology**

Volume Used (gal/yr) = number of cans used per year \* Size of the can (fl oz) \* (1 gal/128 fl oz)

PTE VOC (tons/yr) = Density (lb/gal) \* Volume Used (gal/yr) \* VOC Content (%) \* (1 ton/2,000 lbs)

PTE VOC (lbs/hr) = PTE VOC (tons/yr) \* (2,000 lbs/ton) \* (1 year/8,760 hrs)

<sup>(1)</sup> The penetrating oil MSDS listed the VOC content at less than 1%. It was assumed that it was 1% for PTE calculation purposes.

<sup>(2)</sup> The Cleaner uses Hexane as the main VOC. Hexane is a HAP in addition to being a VOC.

All of the materials are liquid with no particulates.

**Appendix A: Emission Calculations  
PTE from Food Container Line**

**Company Name:** Plastic Recycling, Incorporated  
**Address City IN Zip:** 7601 Rockville Road, Indianapolis, IN 46206  
**Permit No.:** F097-40108-00789  
**Permit Reviewer:** Daniel W. Pell

**PM / PM10 / PM2.5 / VOCs**

Unit	Nominal Capacity* (tons/hr)	Note	PM Emission Factor (lb/ton)	Uncontrolled PM Emissions (ton/yr)	PM10 / PM2.5 Emission Factor (lb/ton)	Uncontrolled PM10 / PM2.5 Emissions (ton/yr)	Uncontrolled PM Emissions (lbs/hr)
Trommel	6.0	1	0.025	0.66	0.0087	0.23	0.15
Optical Sorter	2.0	9, 10	0.011	0.10	0.0011	0.01	0.02
Grinder #S1 **	2.0	2, 3	0.063	0.55	0.063	0.55	0.13
Grinder #S2 **	2.0	2, 3	0.063	0.55	0.063	0.55	0.13
Spin Dryer	2.0	3	0	0	0	0.00	0.00
Cyclone	3.0	7	0.63	8.28	0.63	8.28	1.89
Agglomerator Process	3.0	3, 7	0.63	33.11	0.63	33.11	7.56
Log Shredder	0.75	7, 8	0.63	2.07	0.63	2.07	0.47
Pre-Shredder	0.10	11	0.003	1.31E-03	0.003	1.31E-03	0.000
Extruder	3.0	-	0	0.00	0	0.00	0.00
Pelletizer	3.0	-	0	0.00	0	0.00	0.00
Shaker Table for Extruded Pellets	3.0	-	0.3	3.94	0.3	3.94	0.90
Extruded Pellets Pneumatically Conveyed to Storage Bin	3.0	-	0.00022	0.003	0.00022	2.84E-03	0.00
Extruded Pellets Gravity Dropped to Gaylord Containers	3.0	-	0.003	0.04	0.003	0.04	0.01
<b>Total</b>				<b>49.30</b>		<b>48.79</b>	

**Uncontrolled**

VOC Emission Factor *** (lb/ton)	Uncontrolled VOC Emissions (ton/yr)
0.0	0.00
0.0	0.00
3.75	32.85
3.75	32.85
1.25	10.95
0.0	0.00
1.25	16.43
0.38	1.23
1.00	0.44
1.25	16.43
0.00	0.00
-	0.00
-	0.00
-	0.00
0.00	0.00
111.17	

**Limited Styrene Foam**

Limited VOC Emission Factor (lb/ton) <sup>(4)</sup>	Limited Capacity <sup>(5)</sup> (tons/yr)	Limited VOC Emissions (ton/yr)	Limited PM Emissions from limited Styrene foam Throughput (ton/yr)	Limited PM10 / PM2.5 Emissions from limited Styrene foam Throughput (ton/yr)
0		0.00	0.06	0.02
0	5000	0.00	0.03	0.00
10.00	2500	12.50	0.08	0.08
10.00	2500	12.50	0.08	0.08
3.00		7.50	0.00	0.00
0.00		0.00	1.58	1.58
3.00		7.50	1.58	1.58
1.00	5000	2.50	1.58	1.58
0.25		0.63	0.01	0.01
3.00		7.50	0.00	0.00
0.00		0.00	0.00	0.00
0.00		0.00	0.75	0.75
0.00		0.00	0.00	0.00
0.00		0.00	0.01	0.01
50.63			5.74	5.67

**HAPs**

Unit	Nominal Capacity (tons/hr)	Note	Styrene Emission Factor (lb/ton)	Uncontrolled Styrene Emissions (ton/yr)	Limited Capacity <sup>(5)</sup> (tons/yr)	Limited HAP Emissions from limited Styrene foam Throughput (ton/yr)
Extruder	3.0	6	0.3	3.94	5000	0.75

**Notes:**

- \* Tons of polystyrene (PS) foam per hour
- \*\* Grinders are rated at 2 tons per hour, each; however, for the purposes of PTE, they are "bottlenecked" by the Extruder.
- \*\*\* Overall VOC based on 0.4% VOC content (8 lbs/ton) by weight post-consumer foam and a 25% variation factor; log shredder reduced by 90% due to off-site compression.
- (1) PM, PM10, and PM2.5 Emission factors taken from AP-42, (Emission Factors For Crushed Stone Processing Operations), Table 11.19.2-2; Screening (SCC 3-05-020-02, 03) (08/04).
- (2) Applied 90% reduction to PM emission factor used by Mervis (permit 167-34234-00157, dry grinding), because this source uses wet grinding.
- (3) VOC Emission Factor: Source data indicates 0.4% VOC content (8 lbs/ton) by weight of post-consumer foam. Emission factor spread across grinders, dryer, agglomerator, and extruder, with a conservative allowance of 25%.
- (4) In order to render the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) and 326 IAC 2-7 (Part 70 Permits) not applicable, the source shall comply with the styrene foam throughput limit and the lb/ton emission limits for Grinder #S1 and Grinder #S2.
- (5) Source-wide tons of styrene foam produced is limited to 5,000 tons/year, except for the Grinders #S1 and #S2 which have a styrene foam production limit of 2,500 tons/year.
- (6) Emission Factor from AP-42, Chapter 6.6.3, Table 6.6.3-2.
- (7) PM EF taken from Mervis Industries Permit 167-34234-00157. The Agglomerator Process consists of four steps with four exhaust points. Therefore particulate emissions are multiplied by 4.
- (8) VOC EF for the log shredder is an estimate that 90% of the 3.75 lb/ton is lost as a result of compression. This material is very heavy compared to normal foam and the compression releases nearly all of the blowing agent from the foam.
- (9) PM EF for the Optical Sorter from 167-34234-00157 (Mervis Industries), Loadout Drop Point PM Emission Factor.
- (10) PM10 and PM2.5 Emission Factors for the Optical Sorter from AP-42, (Emission Factors For Crushed Stone Processing Operations); Table 11.19.2-2 Conveyor Transfer Point (SCC-3-05-020-06).
- (11) The new shredder generates hand sized shreds. Emissions of PM and VOC are both a function of the number of cuts it takes to generate the final shred size. 5% is a conservative characterization of the emissions generated by the new shredder compared to the main grinders.

**Methodology:**

Uncontrolled Emissions (tons/yr) = Maximum Capacity (tons/hr) x Emission Factor (lb/ton) x 8760 hr/yr x 1 ton/2000 lbs  
 Limited Emissions (tons/yr) = Limited Capacity (tons/yr) x Limited Emission Factor (lb/ton) x 1 ton/2000 lbs

**Appendix A: Emission Calculations  
PTE from Hanger Line**

**Company Name:** Plastic Recycling, Incorporated  
**Address City IN Zip:** 7601 Rockville Road, Indianapolis, IN 46206  
**Permit No.:** F097-40108-00789  
**Permit Reviewer:** Daniel W. Pell

Unit	Process Weight Rate (tons/hr)	PM Emission Factor (lb/ton)	Uncontrolled PM PTE (lbs/hr)	Uncontrolled PM PTE (ton/yr)	PM10 / PM2.5 Emission Factor (lb/ton)	Uncontrolled PM10 / PM2.5 PTE (ton/yr)	VOC Emission Factor (lb/ton)	Uncontrolled PTE VOC (ton/yr)
Grinder #3 <sup>(1)</sup> / Cyclone Separator	2.0	0.63	1.26	5.52	0.63	5.52	-	-
Vibrating Screen (Particle Sieve) <sup>(2)</sup>	2.0	0.025	0.05	0.22	0.025	0.22	-	-
Two Silos (combined)	2.0	0.011	0.02	0.10	0.011	0.10	-	-
Product Drop (4 drop locations) <sup>(1)</sup>	1.0	0.011	0.0440	0.19	0.011	0.19	-	-
<b>Total</b>				<b>6.03</b>		<b>6.03</b>		<b>0.00</b>

**Methodology:**  
 Uncontrolled PTE (tons/yr) = Maximum Capacity (tons/hr) x Emission Factor (lbs/ton) x 8760 hr/yr x 1 ton/2000 lb.

Cooling Tower Operation	
Total capacity of cooling tower, (gallons/minute)	1,800 (Source Data)
PM10 Emission Factor (lbs/10,000 gallons)	0.019 (Particulate Emission Factors for Wet Cooling Towers (Induced Draft Towers)); AP-42 Section 13.4, Table 13.4-1
Maximum operation, (min/hr)	60 Constant

Calculation:  
 PM10 Emissions (lbs/hr) = (gallons/min.) x (60 min./hr) x (PM10 EF (lbs/10,000 gallons))  
 = 0.90 lb/hr PM10 for cooling tower  
 PM10 Emissions (tons/yr) = (gallons/min.) x (60 min./hr) x (PM10 EF (lbs/10,000 gallons)) x (8,760 hrs/yr.) x (1 ton/2,000 lbs)  
 = 3.94 tons/yr PM10 from cooling tower  
 Cooling Tower Total Uncontrolled PTE: = 3.94 PTE PM / PM10 / PM2.5 (tons/yr)  
 Assume Cooling Tower PM10 = PM = PM2.5

	PM	PM10	PM2.5	VOC
<b>Total Uncontrolled Process Emissions (tons/yr)</b>	<b>9.96</b>	<b>9.96</b>	<b>9.96</b>	<b>0.00</b>

**Notes:**  
 (1) PM, PM10, and PM2.5 emission factors from Material Separator and Loadout Drop Point calculations by Mervis Industries R167-34234-00157.  
 (2) No emission factors are available for granulated/ground plastic transfer points. Emission factor for PM from AP-42 Chapter 11.19, Table 11.19.2-2 (SCC3-05-020-06) for Crushed Stone Processing and Pulverized Mineral Processing Conveyor Transfer Points have been used. Assume PM EF = PM10 EF = PM2.5 EF  
 (3) Emission Factor for VOC derived from VOC EF in AP-42, Table 6.6.3-1, "Emission Factors For Batch Process Polystyrene"; (metric units). 0.6 grams VOC / kg product converts to 1.2 lbs / ton.  
 Assume PM10 = PM = PM2.5 for Cooling Tower PTE.

**326 IAC 6-3-2 Applicability:**  
 Pursuant to 326 IAC 6-3-2(e), particulate emission limits will be calculated as follows:  
 E = Rate of Emissions Limit (lbs/hr)  
 P = Process Weight Rate (tons/hr)  
 Interpolation and extrapolation of the data for process weight rates up to sixty-thousand (60,000) pounds per hour shall be accomplished by use of the equation, E = (4.1) x (P<sup>0.67</sup>) = (4.1) x ((2)<sup>0.67</sup>) = 6.52 lbs.hr. Uncontrolled PM emissions are able to meet the 326 IAC 6-3-2 PM limits without control.

**Appendix A: Emissions Calculations**  
**NG Heating Generators, Boilers, and Heaters**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**

**Company Name:** Plastic Recycling, Incorporated  
**Source Address:** 7601 Rockville Road, Indianapolis, IN 46206  
**Permit Number:** F097-40108-00789  
**Reviewer:** Daniel W. Pell

Unit	Quantity	MMBtu/hr	Total MMBtu/hr
Heating Generators	4	0.125	0.5
Boiler	1	4.2	4.2
Heaters	11	3.125	34.375
Q17 Heater	1	0.4	0.4
			<b>39.48</b>

Heat Input Capacity	mmBtu	Potential Throughput
MMBtu/hr	mmscf	MMCF/yr
39.48	1020	339.0

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	0.32	1.29	1.29	0.10	16.95	0.93	14.24

\*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

### Hazardous Air Pollutants (HAPs)

	HAPs - Organics					Total - 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	3.6E-04	2.0E-04	1.3E-02	0.31	5.8E-04	<b>0.32</b>

	HAPs - Metals					Total - 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	8.5E-05	1.9E-04	2.4E-04	6.4E-05	3.6E-04	<b>9.3E-04</b>
					<b>Total HAPs</b>	<b>0.32</b>
					<b>Worst HAP</b>	<b>0.31</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.

**Appendix A: Emissions Calculations  
PTE from Soil and Groundwater Remediation**

**Company Name:** Plastic Recycling, Incorporated  
**Address City IN Zip:** 7601 Rockville Road, Indianapolis, IN 46206  
**Permit Number:** F097-40108-00789  
**Reviewer:** Daniel W. Pell

Constituent	Influent to stripper		Potential Emissions		
	mg/L	lb/gal	lb/hr	lb/day	ton/yr
1,1-dichloroethane (VOC)	0.26	4.46E-07	0.00080	0.01926	3.51E-03
cis 1,2 - dichloroethylene (VOC)	0.05	8.57E-08	0.00015	0.00370	6.76E-04
1,1 - dichloroethylene (VOC)	0.01	1.71E-08	3.09E-05	0.00074	1.35E-04
chloroethane (VOC)	0.39	6.69E-07	0.00120	0.02889	5.27E-03
vinil chloride (HAP)	0.06	1.03E-07	0.00019	0.00444	8.11E-04
trichloroethylene (HAP)	0.005	8.57E-09	0.00002	0.00037	6.76E-05
trans 1,2 dichloroethylene (VOC)	1.227	2.10E-06	0.00379	0.09089	1.66E-02
chloroform (HAP)	0.005	8.57E-09	1.54E-05	0.00037	6.76E-05
carbon tetrachloride (HAP)	0.262	4.49E-07	0.00081	0.01941	3.54E-03
tetrachloroethylene (HAP)	0.005	8.57E-09	1.54E-05	0.00037	6.76E-05

**Total VOC: 3.07E-02**

**Worst Single HAP: 3.54E-03**

**Total HAP: 4.56E-03**

Influent to Stripper (mg/L) data based on October 29, 2007 analytical data.

Air Stripper'd Max groundwater processing capacity:

30 gal/min

Convert mg/L to lb/gal: 1mg/L x 1 kg/1,000,000 mg x 1 lb/2.205 kg x 3.781 L/gal

Calculations

Potential VOC (HAP) Emission (ton/yr) = Influent to Stripper (lb/gal) x GW Process Cap (gal/min) x 60 min/hr x 24 hr/day x 365 day/yr x 1ton/2,000 lb)

**Appendix A: Emission Calculations  
PTE from Fugitive Dust Emissions - Paved Roads**

**Company Name:** Plastic Recycling, Incorporated  
**Source Address:** 7601 Rockville Road, Indianapolis, IN 46206  
**Permit Number:** F097-40108-00789  
**Reviewer:** Daniel W. Pell

**Paved Roads at Industrial Site**

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Truck traffic (entering plant) (one-way trip)	29.0	2.0	58.0	10.0	580.0	450	0.085	4.9	1804.3
Truck traffic (leaving plant) (one-way trip)	29.0	2.0	58.0	3.0	174.0	450	0.085	4.9	1804.3
<b>Totals</b>			<b>116.0</b>		<b>754.0</b>			<b>9.9</b>	<b>3608.5</b>

Average Vehicle Weight Per Trip = 

6.5
-----

 tons/trip  
 Average Miles Per Trip = 

0.09
------

 miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	6.5	6.5	6.5	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m <sup>2</sup> = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3

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

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

125
-----

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

365
-----

 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.587	0.117	0.0288	lb/mile
Mitigated Emission Factor, Eext =	0.537	0.107	0.0263	lb/mile

Process	Mitigated PTE of PM (Before Control) (tons/yr)	Mitigated PTE of PM10 (Before Control) (tons/yr)	Mitigated PTE of PM2.5 (Before Control) (tons/yr)
Truck traffic (entering plant) (one-way trip)	0.48	0.10	0.02
Truck traffic (leaving plant) (one-way trip)	0.48	0.10	0.02
<b>Totals</b>	<b>0.97</b>	<b>0.19</b>	<b>0.05</b>

**Methodology**

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

**Abbreviations**

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





# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Eric J. Holcomb**  
Governor

**Bruno L. Pigott**  
Commissioner

December 26, 2018

Alex Ramion  
Plastic Recycling, Incorporated  
4434 Sam Jones Expressway  
Indianapolis, IN 46241

Re: Public Notice  
Plastic Recycling, Incorporated  
Permit Level: FESOP NSC Minor PSD  
Permit Number: 097-40108-00789

Dear Mr. Ramion:

Enclosed is a copy of your draft FESOP New Source Construction Minor PSD, 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 Indianapolis Star in Indianapolis, IN publish the abbreviated version of the public notice no later than December 28, 2018. 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 Indianapolis-Marion County Public Library – Wayne Township Branch, 198 South Girls School Road in Indianapolis, IN. 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 Daniel W. Pell, 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 4-8532 or dial (317) 234-8532.

Sincerely,

*Theresa Weaver*

Theresa Weaver  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover Letter 1/9/2017



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Eric J. Holcomb**  
Governor

**Bruno L. Pigott**  
Commissioner

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

December 26, 2018

Indianapolis Star  
130 S. Meridian St.  
Indianapolis, IN 46225

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Plastic Recycling, Incorporated, Marion 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 December 28, 2018.

Please send the invoice, notarized form, clippings showing the date of publication to Bo Liu, at the Indiana Department of Environmental Management, Accounting, Room N1340, 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 Theresa Weaver at 800-451-6027 and ask for extension 4-5256 or dial 317-234-5256.

Sincerely,

*Theresa Weaver*

Theresa Weaver  
Permit Branch  
Office of Air Quality

Permit Level: FESOP New Source Construction Minor PSD  
Permit Number: 097-40108-00789

Enclosure

PN Newspaper Letter 8/22/2018



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Eric J. Holcomb**  
Governor

**Bruno L. Pigott**  
Commissioner

December 26, 2018

To: Indianapolis-Marion County Public Library – Wayne Township Branch

From: Jenny Acker, Branch Chief  
Permits Branch  
Office of Air Quality

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

**Applicant Name: Plastic Recycling, Incorporated**  
**Permit Number: 097-40108-00789**

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 1/9/2017



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Eric J. Holcomb**  
Governor

**Bruno L. Pigott**  
Commissioner

## Notice of Public Comment

**December 26, 2018**  
**Plastic Recycling, Incorporated**  
**097-40108-00789**

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 Letter 1/9/2017


# Mail Code 61-53

IDEM Staff	TAWEAVER 12/26/2018 Plastic Recvcling Incorporated 097-40108-00789 (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		Alex Ramion Plastic Recycling Incorporated 4434 Sam Jones Expressway Indianapolis IN 46241 (Source CAATS)									
2		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)									
3		Indianapolis City Council and Mayors office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)									
4		Carmel City Council and Mayors Office 1 Civic Square Carmel IN 46032 (Local Official)									
5		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)									
6		Wayne Township Public Library 198 South Girls School Rd. Indianapolis IN 46231 (Library)									
7		Matt Mosier Office of Sustainability City-County Bldg/200 E Washington St. Rm# 2460 Indianapolis IN 46204 (Local Official)									
8		Johan & Susan Van Den Heuvel 4409 Blue Creek Drive Carmel IN 46033 (Affected Party)									
9		Indiana Members Credit Union 5103 Madison Avenue Indianapolis IN 46227 (Affected Party)									
10		TGM Autumn Woods, Inc. 500 North Dearboen, Suite 400 Chicago IL 60654 (Affected Party)									
11		Paul Dubenetzky Cornerstone Environmental 880 Lennox Court Zionsville IN 46077 (Consultant)									
12		7870 W. Morris St. Indianapolis IN 46231 (Affected Party)									
13		7507 Rockville Rd. Indianapolis IN 45214 (Affected Party)									
14		7515 Rockville Rd. Indianapolis IN 45214 (Affected Party)									
15		7545 Rockville Rd. Indianapolis IN 45214 (Affected Party)									

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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1		7600 Rockville Rd. Indianapolis IN 45214 (Affected Party)										
2		7830 Rockville Rd. Indianapolis IN 45214 (Affected Party)										
3		7840 Rockville Rd. Indianapolis IN 45214 (Affected Party)										
4		7904 Rockville Rd. Indianapolis IN 45214 (Affected Party)										
5		7900 Rockville Rd. Indianapolis IN 45214 (Affected Party)										
6		0 Railroad Row Indianapolis IN 46204 (Affected Party)										
7												
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.
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