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
Eric J. Holcomb, *Governor*
Bruno L. Pigott, *Commissioner*

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Minor Source Operating Permit (MSOP)
for RTP Company in Marion County
MSOP Renewal No.: M097--40626-00316

The Indiana Department of Environmental Management (IDEM) has received an application from RTP Company located at 8111 Zionsville Road, Indianapolis, Indiana 46268 for a renewal of its MSOP issued on February 18, 2009. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow RTP Company to continue to operate its existing source.

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

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

Indianapolis Public Library- Pike Branch
6525 Zionsville Road
Indianapolis, IN 46268

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 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

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

application, please contact IDEM at the address below. Please refer to permit number M097-40626-00316 in all correspondence.

Comments should be sent to:

Jeries Smirat
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Jeries Smirat or (317) 234-5374
Or dial directly: (317) 234-5374
Fax: (317) 232-6749 attn: Jeries Smirat
E-mail: Jsmirat @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?qsp=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 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

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

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

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DRAFT

Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

RTP Company
8111 Zionsville Road
Indianapolis, Indiana 46268

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

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: 097-40626-00316 Master Agency Interest ID: 11547	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	 Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary thermoplastic compounding operation.

Source Address:	8111 Zionsville Road, Indianapolis, Indiana 46268
General Source Phone Number:	317-802-3813
SIC Code:	3087 (Custom Compounding of Purchased Platics Resins)
County Location:	Marion Outside Center, Perry, and Wayne Townships
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) Nine (9) Thermoplastic Compounding Extruders;

(1) Two (2) Thermoplastic Compounding 2.5" Extruders, identified as I-1 and I-2, constructed in 1997, each with a maximum production capacity of 500 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(2) One (1) Thermoplastic Compounding 70 mm Extruder, identified as I-6, constructed in 2001, with a maximum capacity of 1,000 pounds per hour of specialty plastic resins, using dust a collector (DC-1) for particulate control, exhausting to stack S-1;

(3) Two (2) Thermoplastic Compounding 3.5" Extruders, identified as I-7 and I-8, constructed in 1997, each with a maximum capacity of 900 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(4) Two (2) Thermoplastic Compounding 4.5" Extruders, identified as I-11 and I-12, constructed in 1997, each with a maximum capacity of 2,200 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(5) One (1) Thermoplastic Compounding 2" R&D Extruder, identified as I-13, constructed in 1997, with a maximum capacity of 250 pounds per hour of specialty plastic resins, using a dust collector (DC-2) for particulate control, exhausting to stack S-2;

(6) One (1) Thermoplastic Compounding 1.5" R&D Extruder, identified as I-15,

constructed in 1997, with a maximum capacity of 100 pounds per hour of specialty plastic resins, using a dust collector (DC-2) for particulate control, exhausting to stack S-2;

(b) Five (5) VLF Extrusion lines;

(1) One (1) VLF Extrusion Line 1, identified as I-17, constructed in 1997, consisting of the following:
(i) one (1) Thermoplastic Long Fiber Resin Extruder and
(ii) one (1) air classifier,
with a maximum production capacity of 800 pounds per hour of VLF pellets, using a dust collector (DC-4) for particulate control, exhausting through two (2) stacks S-5a and S-5b.

The extruder is used to process a plastic resin which consists primarily of polypropylene, polybutylene, ABS and nylon resins;

(2) One (1) VLF Extrusion Line 2, identified as I-18, constructed in 1997, consisting of the following:
(i) one (1) Thermoplastic Long Fiber Resin Extruder and
(ii) one (1) air classifier,
with a maximum production capacity of 800 pounds per hour of VLF pellets, using a dust collector (DC-5) for particulate control, exhausting through two (2) stacks S-6a and S-6b.

The extruder is used to process a plastic resin which consists primarily of polypropylene, polybutylene, ABS and nylon resins;

(3) One (1) VLF Extrusion Line 3, identified as I-19, constructed in 2004, consisting of the following:
(i) one (1) Thermoplastic Long Fiber Resin Extruder
(ii) one (1) cooling bath
(iii) one (1) chopper and
(iv) one (1) air classifier,
with a maximum plastic resin throughput of 420 pounds per hour and a maximum production capacity of 700 pounds per hour of VLF pellets, using a dust collector (DC-6) for particulate control, exhausting through two (2) stacks S-7a and S-7b;

(4) One (1) VLF Extrusion Line 4, identified as I-20, constructed in 2006, consisting of the following:
(i) one (1) Thermoplastic Long Fiber Resin Extruder,
(ii) one (1) cooling bath,
(iii) one (1) puller,
(iv) one (1) chopper and
(v) one (1) air classifier,
with a maximum plastic resin throughput of 630 pounds per hour and a maximum production capacity of 1,050 pounds per hour of VLF pellets, using a dust collector (DC-7) for particulate control, exhausting through two (2) stacks S-8a and S-8b; and

(5) One (1) VLF Extrusion Line 5, identified as I-21, construction in 2008, consisting of the following:
(i) one (1) Thermoplastic Long Fiber Resin Extruder,
(ii) one (1) cooling bath,
(iii) one (1) puller,
(iv) one (1) chopper and

(v) one (1) air classifier,
with a maximum plastic resin throughput of 630 pounds per hour and a maximum production capacity of 1,050 pounds per hour of VLF pellets, using a dust collector (DC-8) for particulate control, exhausting through two (2) stacks S-9a and S-9b.

(c) Seven (7) resin pre-mixers;

(1) One (1) 500 pound capacity resin pre-mixer, identified as B-00, constructed in 1998, with a maximum throughput of 100 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(2) Two (2) 3,300 pound capacity resin pre-mixers, identified as B-1 and B-3, constructed in 1997, each with a maximum throughput of 1,400 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(3) Two (2) 6,600 pound capacity resin pre-mixers, identified as B-6 and B-7, constructed in 1997, each with a maximum throughput of 1,400 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(4) One (1) 22,000 pound capacity resin pre-mixer, identified as B-10, constructed in 2004, with a maximum throughput of 1,000 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(5) One (1) 22,000 pound capacity resin pre-mixer, identified as B-11, constructed in 2004, with a maximum throughput of 2,200 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(d) Five (5) resin post-mixers;

(1) One (1) 3,300 pound capacity resin post-mixer, identified as B-12, constructed in 1997, with a maximum throughput of 500 pounds per hour of specialty plastic resins, and no control. This unit is a closed unit with no exhaust.

(2) One (1) 12,000 pound capacity resin post-mixer, identified as B-13, constructed in 1997, with a maximum throughput of 1,400 pounds per hour of specialty plastic resins, and no control. This unit is a closed unit with no exhaust.

(3) One (1) 6,600 pound capacity resin post-mixer, identified as B-14, constructed in 1997, with a maximum throughput of 1,000 pounds per hour of specialty plastic resins, and no control. This unit is a closed unit with no exhaust.

(4) One (1) 22,000 pound capacity resin post-mixer, identified as B-15, constructed in 1999, with a maximum throughput of 2,200 pounds per hour of specialty plastic resins, and no control. This unit is a closed unit with no exhaust.

(5) One (1) 22,000 pound capacity resin post-mixer, identified as B-16, constructed in 2002, with a maximum throughput of 2,200 pounds per hour of specialty plastic resins, and no control. This unit is a closed unit with no exhaust.

(e) One (1) Electric Dryer, identified as D-1, constructed in 1997, with a maximum capacity of

200 pounds per hour of specialty plastic resins, using a dust collector (DC-2) for particulate control, exhausting to stack S-2;

(f) One (1) Pigment Weigh Hood, identified as H-1, constructed in 1997, with maximum capacity of 20 pounds per hour of pigment, using a dust collector (DC-2) for particulate control, exhausting to stack S-2;

(g) One (1) Scale Station for raw material weighing, identified as H-2, constructed in 1998, with a maximum capacity of 500 pounds per hour of raw material, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(h) Three (3) Bar Mold Machines;

(1) One (1) Bar Mold Machine, identified as M-1a, constructed in 1997, with maximum capacity of 200 pounds per hour, using a dust collector (DC-2) for particulate control, exhausting to stack S-2;

(2) One (1) Bar Mold Machine, identified as M-1c, constructed in 2014, with maximum capacity of 15 pounds per hour, using no controls, and exhausting indoors;

(3) One (1) Bar Mold Machine, identified as M-1d, constructed in 2014, with maximum capacity of 10 pounds per hour, using no controls, and exhausting indoors;

(i) Two (2) Color Chip Mold Machines, identified as M-2 and M-3, constructed in 1997, with maximum capacity of 100 pounds per hour each, using a dust collector (DC-2) for particulate control, exhausting to stack S-2;

(j) One (1) Aspiration Separator Unit, identified as A-1, constructed in 1997, with a maximum operating capacity of 3,000 pounds per hour of VLF pellets, and a flow rate of 7,200 acfm, using a dust collector (DC-3) as control, exhausting to stack S-4;

(k) Two (2) Pyrolysis Ovens:

(1) One (1) IGG-17L Pyrolysis Oven, identified as PF-1, constructed in 1997, with a maximum heat input of 0.95 MMBTU/hr, burning natural gas, processing less than 50 pounds per hour of plastic, and exhausting to stack S-3. The pyrolysis oven operates in batch mode at a maximum of one (1) 8-hour cycle per day and is used to clean, by thermal decomposition, the plastic resin on the extruder screws;

(2) One (1) PCP Model G2T Pyrolysis Oven, identified as PF-2, constructed in 2008, with a maximum heat input of 0.475 MMBTU/hr, burning natural gas, processing a maximum of 10 pounds per hour of plastic, and exhausting to stack S-10. The pyrolysis oven operates in batch mode at a maximum of two (2) 4-hour cycles per day and is used to clean, by thermal decomposition, the plastic resin on the plastic extrusion dies.

(l) Ten (10) natural gas-fired heaters;

(1) Eight (8) natural gas-fired heaters, constructed in 1997, each with a maximum capacity of 0.25 MMBtu per hour; and

(2) Two (2) natural gas-fired heaters, constructed in 2012, each with a maximum capacity of 2.63 MMBtu per hour.

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, 097-40626-00316, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

(c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

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

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

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to 097-40626-00316 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.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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

B.12 Permit Renewal [326 IAC 2-6.1-7]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

B.14 Source Modification Requirement

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

B.15 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Permit Revocation [326 IAC 2-1.1-9]

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

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of 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.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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

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

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

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

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

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are

applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

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

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the

Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

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

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

C.15 Malfunctions Report [326 IAC 1-6-2]

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

(a) A record of all malfunctions, startups or shutdowns of any emission unit or emission control equipment, that results in violations of applicable air pollution control regulations or applicable emission limitations must be kept and retained for a period of three (3) years and be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any emission unit or emission control equipment occurs that lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.

(c) Failure to report a malfunction of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information on the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

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

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Nine (9) Thermoplastic Compounding Extruders;

(1) Two (2) Thermoplastic Compounding 2.5" Extruders, identified as I-1 and I-2, constructed in 1997, each with a maximum production capacity of 500 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(2) One (1) Thermoplastic Compounding 70 mm Extruder, identified as I-6, constructed in 2001, with a maximum capacity of 1,000 pounds per hour of specialty plastic resins, using dust a collector (DC-1) for particulate control, exhausting to stack S-1;

(3) Two (2) Thermoplastic Compounding 3.5" Extruders, identified as I-7 and I-8, constructed in 1997, each with a maximum capacity of 900 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(4) Two (2) Thermoplastic Compounding 4.5" Extruders, identified as I-11 and I-12, constructed in 1997, each with a maximum capacity of 2,200 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(5) One (1) Thermoplastic Compounding 2" R&D Extruder, identified as I-13, constructed in 1997, with a maximum capacity of 250 pounds per hour of specialty plastic resins, using a dust collector (DC-2) for particulate control, exhausting to stack S-2;

(6) One (1) Thermoplastic Compounding 1.5" R&D Extruder, identified as I-15, constructed in 1997, with a maximum capacity of 100 pounds per hour of specialty plastic resins, using a dust collector (DC-2) for particulate control, exhausting to stack S-2;

(b) Five (5) VLF Extrusion lines;

(1) One (1) VLF Extrusion Line 1, identified as I-17, constructed in 1997, consisting of the following:
(i) one (1) Thermoplastic Long Fiber Resin Extruder and
(ii) one (1) air classifier,
with a maximum production capacity of 800 pounds per hour of VLF pellets, using a dust collector (DC-4) for particulate control, exhausting through two (2) stacks S-5a and S-5b.

The extruder is used to process a plastic resin which consists primarily of polypropylene, polybutylene, ABS and nylon resins;

(2) One (1) VLF Extrusion Line 2, identified as I-18, constructed in 1997, consisting of the following:
(i) one (1) Thermoplastic Long Fiber Resin Extruder and
(ii) one (1) air classifier,
with a maximum production capacity of 800 pounds per hour of VLF pellets,

using a dust collector (DC-5) for particulate control, exhausting through two (2) stacks S-6a and S-6b.

The extruder is used to process a plastic resin which consists primarily of polypropylene, polybutylene, ABS and nylon resins;

(3) One (1) VLF Extrusion Line 3, identified as I-19, constructed in 2004, consisting of the following:
(i) one (1) Thermoplastic Long Fiber Resin Extruder
(ii) one (1) cooling bath
(iii) one (1) chopper and
(iv) one (1) air classifier,
with a maximum plastic resin throughput of 420 pounds per hour and a maximum production capacity of 700 pounds per hour of VLF pellets, using a dust collector (DC-6) for particulate control, exhausting through two (2) stacks S-7a and S-7b;

(4) One (1) VLF Extrusion Line 4, identified as I-20, constructed in 2006, consisting of the following:
(i) one (1) Thermoplastic Long Fiber Resin Extruder,
(ii) one (1) cooling bath,
(iii) one (1) puller,
(iv) one (1) chopper and
(v) one (1) air classifier,
with a maximum plastic resin throughput of 630 pounds per hour and a maximum production capacity of 1,050 pounds per hour of VLF pellets, using a dust collector (DC-7) for particulate control, exhausting through two (2) stacks S-8a and S-8b; and

(5) One (1) VLF Extrusion Line 5, identified as I-21, construction in 2008, consisting of the following:
(i) one (1) Thermoplastic Long Fiber Resin Extruder,
(ii) one (1) cooling bath,
(iii) one (1) puller,
(iv) one (1) chopper and
(v) one (1) air classifier,
with a maximum plastic resin throughput of 630 pounds per hour and a maximum production capacity of 1,050 pounds per hour of VLF pellets, using a dust collector (DC-8) for particulate control, exhausting through two (2) stacks S-9a and S-9b.

(c) Seven (7) resin pre-mixers;

(1) One (1) 500 pound capacity resin pre-mixer, identified as B-00, constructed in 1998, with a maximum throughput of 100 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(2) Two (2) 3,300 pound capacity resin pre-mixers, identified as B-1 and B-3, constructed in 1997, each with a maximum throughput of 1,400 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(3) Two (2) 6,600 pound capacity resin pre-mixers, identified as B-6 and B-7, constructed in 1997, each with a maximum throughput of 1,400 pounds per

hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(4) One (1) 22,000 pound capacity resin pre-mixer, identified as B-10, constructed in 2004, with a maximum throughput of 1,000 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(5) One (1) 22,000 pound capacity resin pre-mixer, identified as B-11, constructed in 2004, with a maximum throughput of 2,200 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(d) Five (5) resin post-mixers;

(1) One (1) 3,300 pound capacity resin post-mixer, identified as B-12, constructed in 1997, with a maximum throughput of 500 pounds per hour of specialty plastic resins, and no control. This unit is a closed unit with no exhaust.

(2) One (1) 12,000 pound capacity resin post-mixer, identified as B-13, constructed in 1997, with a maximum throughput of 1,400 pounds per hour of specialty plastic resins, and no control. This unit is a closed unit with no exhaust.

(3) One (1) 6,600 pound capacity resin post-mixer, identified as B-14, constructed in 1997, with a maximum throughput of 1,000 pounds per hour of specialty plastic resins, and no control. This unit is a closed unit with no exhaust.

(4) One (1) 22,000 pound capacity resin post-mixer, identified as B-15, constructed in 1999, with a maximum throughput of 2,200 pounds per hour of specialty plastic resins, and no control. This unit is a closed unit with no exhaust.

(5) One (1) 22,000 pound capacity resin post-mixer, identified as B-16, constructed in 2002, with a maximum throughput of 2,200 pounds per hour of specialty plastic resins, and no control. This unit is a closed unit with no exhaust.

(f) One (1) Pigment Weigh Hood, identified as H-1, constructed in 1997, with maximum capacity of 20 pounds per hour of pigment, using a dust collector (DC-2) for particulate control, exhausting to stack S-2;

(g) One (1) Scale Station for raw material weighing, identified as H-2, constructed in 1998, with a maximum capacity of 500 pounds per hour of raw material, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(h) Three (3) Bar Mold Machines;

(1) One (1) Bar Mold Machine, identified as M-1a, constructed in 1997, with maximum capacity of 200 pounds per hour, using a dust collector (DC-2) for particulate control, exhausting to stack S-2;

(2) One (1) Bar Mold Machine, identified as M-1c, constructed in 2014, with maximum capacity of 15 pounds per hour, using no controls, and exhausting indoors;

(3) One (1) Bar Mold Machine, identified as M-1d, constructed in 2014, with maximum capacity of 10 pounds per hour, using no controls, and exhausting indoors;

(i) Two (2) Color Chip Mold Machines, identified as M-2 and M-3, constructed in 1997, with maximum capacity of 100 pounds per hour each, using a dust collector (DC-2) for particulate control, exhausting to stack S-2;

(j) One (1) Aspiration Separator Unit, identified as A-1, constructed in 1997, with a maximum operating capacity of 3,000 pounds per hour of VLF pellets, and a flow rate of 7,200 acfm, using a dust collector (DC-3) as control, exhausting to stack S-4;

(l) Ten (10) natural gas-fired heaters;

(1) Eight (8) natural gas-fired heaters, constructed in 1997, each with a maximum capacity of 0.25 MMBtu per hour; and

(2) Two (2) natural gas-fired heaters, constructed in 2012, each with a maximum capacity of 2.63 MMBtu per hour.

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

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

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from the following emission units shall each be limited to 0.03 grain per dry standard cubic foot of exhaust air.

Unit	Unit ID #
Nine (9) Thermoplastic Compounding Extruders	I-1, I-2, I-6, I-7, I-8, I-11, I-12, I-13, and I-15
Five (5) VLF Extrusion lines	I-17, I-18, I-19, I-20, and I-21
Seven (7) Resin Pre-Mixers	B-00, B-1, B-3, B-6, B-7, B-10, and B-11
Five (5) Resin Post-Mixers	B-12, B-13, B-14, B-15, and B-16
One (1) Pigment Weigh Hood	H-1
One (1) Scale Station	H-2
Three (3) Bar Mold Machines	M-1a, M-1c, and M-1d,
Two (2) Color Chip Mold Machines	M-2 and M-3
One (1) Aspiration Separator Unit	A-1
Ten (10) Natural Gas-fired Heaters	N/A

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(k) Two (2) Pyrolysis Ovens:

(1) One (1) IGG-17L Pyrolysis Oven, identified as PF-1, constructed in 1997, with a maximum heat input of 0.95 MMBTU/hr, burning natural gas, processing less than 50 pounds per hour of plastic, and exhausting to stack S-3. The pyrolysis oven operates in batch mode at a maximum of one (1) 8-hour cycle per day and is used to clean, by thermal decomposition, the plastic resin on the extruder screws;

(2) One (1) PCP Model G2T Pyrolysis Oven, identified as PF-2, constructed in 2008, with a maximum heat input of 0.475 MMBTU/hr, burning natural gas, processing a maximum of 10 pounds per hour of plastic, and exhausting to stack S-10. The pyrolysis oven operates in batch mode at a maximum of two (2) 4-hour cycles per day and is used to clean, by thermal decomposition, the plastic resin on the plastic extrusion dies.

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

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

D.2.1 Incinerators [326 IAC 4-2-2]

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

(a) All incinerators shall comply with the following requirements:

(1) Consist of primary and secondary chambers or the equivalent.

(2) Be equipped with a primary burner unless burning only wood products.

(3) Comply with 326 IAC 5-1 (Opacity Limitations) and 326 IAC 2 (Permit Review Rules).

(4) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in Condition D.2.1(c).

(5) Not emit particulate matter in excess of one (1) of the following:

(A) Three-tenths (0.3) pound 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 a maximum solid waste capacity of greater than or equal to two hundred (200) pounds per hour.

(B) Five-tenths (0.5) pound 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 less than two hundred (200) pounds per hour.

(6) If any of the requirements in Conditions D.2.1(a)(1) through (5) are not met, then

the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

(b) An incinerator is exempt from Condition D.2.1(a)(5) if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P, State Implementation Plan for Indiana.

(c) An owner or operator developing an operation and maintenance plan pursuant to Condition D.2.1 (a)(4) must comply with the following:

(1) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in Condition D.2.1 (a)(5) and include the following:

(A) Procedures for receiving, handling, and charging waste.

(B) Procedures for incinerator startup and shutdown.

(C) Procedures for responding to a malfunction.

(D) Procedures for maintaining proper combustion air supply levels.

(E) Procedures for operating the incinerator and associated air pollution control systems.

(F) Procedures for handling ash.

(G) A list of wastes that can be burned in the incinerator.

(2) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.

(3) The operation and maintenance plan must be readily accessible to incinerator operators.

(4) The owner or operator of the incinerator shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.

(d) The owner or operator of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

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

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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

Company Name:	RTP Company
Address:	8111 Zionsville Road
City:	Indianapolis, Indiana 46268
Phone #:	317-802-3813
MSOP #:	097-40626-00316

I hereby certify that RTP Company is:
- ☐ still in operation.
- ☐ no longer in operation.

I hereby certify that RTP Company is:
- ☐ in compliance with the requirements of MSOP 097-40626-00316.
- ☐ not in compliance with the requirements of MSOP 097-40626-00316.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____
_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

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

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

_____
_____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit (MSOP) Renewal

Source Description and Location

Source Name:	**RTP Company**
Source Location:	**8111 Zionsville Road, Indianapolis, Indiana 46268**
County:	**Marion**
SIC Code:	**3087 (Custom compounding of purchased plastics resins)**
Permit Renewal No.:	**097-40626-00316**
Permit Reviewer:	**Jeries Smirat**

On October 24, 2018, RTP Company submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from RTP Company relating to the operation of a stationary thermoplastic compounding operation. RTP Company was issued its first MSOP Renewal (M 097-21096-00316) on February 18, 2009.

Permitted Emission Units and Pollution Control Equipment

The descrittions of the existing emissions have been revised for clarity.

The source consists of the following permitted emission units:

(a) Nine (9) Thermoplastic Compounding Extruders;

(1) Two (2) Thermoplastic Compounding 2.5" Extruders, identified as I-1 and I-2, constructed in 1997, each with a maximum production capacity of 500 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(2) One (1) Thermoplastic Compounding 70 mm Extruder, identified as I-6, constructed in 2001, with a maximum capacity of 1,000 pounds per hour of specialty plastic resins, using dust a collector (DC-1) for particulate control, exhausting to stack S-1;

(3) Two (2) Thermoplastic Compounding 3.5" Extruders, identified as I-7 and I-8, constructed in 1997, each with a maximum capacity of 900 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(4) Two (2) Thermoplastic Compounding 4.5" Extruders, identified as I-11 and I-12, constructed in 1997, each with a maximum capacity of 2,200 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(5) One (1) Thermoplastic Compounding 2" R&D Extruder, identified as I-13, constructed in 1997, with a maximum capacity of 250 pounds per hour of specialty plastic resins, using a dust collector (DC-2) for particulate control, exhausting to stack S-2;

(6) One (1) Thermoplastic Compounding 1.5" R&D Extruder, identified as I-15, constructed in 1997, with a maximum capacity of 100 pounds per hour of specialty plastic resins, using a dust collector (DC-2) for particulate control, exhausting to stack S-2;

(b) Five (5) VLF Extrusion lines;

(1) One (1) VLF Extrusion Line 1, identified as I-17, constructed in 1997, consisting of the following:
(i) one (1) Thermoplastic Long Fiber Resin Extruder and
(ii) one (1) air classifier,
with a maximum production capacity of 800 pounds per hour of VLF pellets, using a dust collector (DC-4) for particulate control, exhausting through two (2) stacks S-5a and S-5b.

The extruder is used to process a plastic resin which consists primarily of polypropylene, polybutylene, ABS and nylon resins;

(2) One (1) VLF Extrusion Line 2, identified as I-18, constructed in 1997, consisting of the following:
(i) one (1) Thermoplastic Long Fiber Resin Extruder and
(ii) one (1) air classifier,
with a maximum production capacity of 800 pounds per hour of VLF pellets, using a dust collector (DC-5) for particulate control, exhausting through two (2) stacks S-6a and S-6b.

The extruder is used to process a plastic resin which consists primarily of polypropylene, polybutylene, ABS and nylon resins;

(3) One (1) VLF Extrusion Line 3, identified as I-19, constructed in 2004, consisting of the following:
(i) one (1) Thermoplastic Long Fiber Resin Extruder
(ii) one (1) cooling bath
(iii) one (1) chopper and
(iv) one (1) air classifier,
with a maximum plastic resin throughput of 420 pounds per hour and a maximum production capacity of 700 pounds per hour of VLF pellets, using a dust collector (DC-6) for particulate control, exhausting through two (2) stacks S-7a and S-7b;

(4) One (1) VLF Extrusion Line 4, identified as I-20, constructed in 2006, consisting of the following:
(i) one (1) Thermoplastic Long Fiber Resin Extruder,
(ii) one (1) cooling bath,
(iii) one (1) puller,
(iv) one (1) chopper and
(v) one (1) air classifier,
with a maximum plastic resin throughput of 630 pounds per hour and a maximum production capacity of 1,050 pounds per hour of VLF pellets, using a dust collector (DC-7) for particulate control, exhausting through two (2) stacks S-8a and S-8b; and

(5) One (1) VLF Extrusion Line 5, identified as I-21, construction in 2008, consisting of the following:
(i) one (1) Thermoplastic Long Fiber Resin Extruder,
(ii) one (1) cooling bath,

(iii) one (1) puller,
(iv) one (1) chopper and
(v) one (1) air classifier,
with a maximum plastic resin throughput of 630 pounds per hour and a maximum production capacity of 1,050 pounds per hour of VLF pellets, using a dust collector (DC-8) for particulate control, exhausting through two (2) stacks S-9a and S-9b.

(c) Seven (7) resin pre-mixers;

(1) One (1) 500 pound capacity resin pre-mixer, identified as B-00, constructed in 1998, with a maximum throughput of 100 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(2) Two (2) 3,300 pound capacity resin pre-mixers, identified as B-1 and B-3, constructed in 1997, each with a maximum throughput of 1,400 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(3) Two (2) 6,600 pound capacity resin pre-mixers, identified as B-6 and B-7, constructed in 1997, each with a maximum throughput of 1,400 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(4) One (1) 22,000 pound capacity resin pre-mixer, identified as B-10, constructed in 2004, with a maximum throughput of 1,000 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(5) One (1) 22,000 pound capacity resin pre-mixer, identified as B-11, constructed in 2004, with a maximum throughput of 2,200 pounds per hour of specialty plastic resins, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(d) Five (5) resin post-mixers;

(1) One (1) 3,300 pound capacity resin post-mixer, identified as B-12, constructed in 1997, with a maximum throughput of 500 pounds per hour of specialty plastic resins, and no control. This unit is a closed unit with no exhaust.

(2) One (1) 12,000 pound capacity resin post-mixer, identified as B-13, constructed in 1997, with a maximum throughput of 1,400 pounds per hour of specialty plastic resins, and no control. This unit is a closed unit with no exhaust.

(3) One (1) 6,600 pound capacity resin post-mixer, identified as B-14, constructed in 1997, with a maximum throughput of 1,000 pounds per hour of specialty plastic resins, and no control. This unit is a closed unit with no exhaust.

(4) One (1) 22,000 pound capacity resin post-mixer, identified as B-15, constructed in 1999, with a maximum throughput of 2,200 pounds per hour of specialty plastic resins, and no control. This unit is a closed unit with no exhaust.

(5) One (1) 22,000 pound capacity resin post-mixer, identified as B-16, constructed in 2002, with a maximum throughput of 2,200 pounds per hour of specialty plastic resins, and no control. This unit is a closed unit with no exhaust.

(e) One (1) Electric Dryer, identified as D-1, constructed in 1997, with a maximum capacity of 200 pounds per hour of specialty plastic resins, using a dust collector (DC-2) for particulate control, exhausting to stack S-2;

(f) One (1) Pigment Weigh Hood, identified as H-1, constructed in 1997, with maximum capacity of 20 pounds per hour of pigment, using a dust collector (DC-2) for particulate control, exhausting to stack S-2;

(g) One (1) Scale Station for raw material weighing, identified as H-2, constructed in 1998, with a maximum capacity of 500 pounds per hour of raw material, using a dust collector (DC-1) for particulate control, exhausting to stack S-1;

(h) Three (3) Bar Mold Machines;

(1) One (1) Bar Mold Machine, identified as M-1a, constructed in 1997, with maximum capacity of 200 pounds per hour, using a dust collector (DC-2) for particulate control, exhausting to stack S-2;

(2) One (1) Bar Mold Machine, identified as M-1c, constructed in 2014, with maximum capacity of 15 pounds per hour, using no controls, and exhausting indoors;

(3) One (1) Bar Mold Machine, identified as M-1d, constructed in 2014, with maximum capacity of 10 pounds per hour, using no controls, and exhausting indoors;

(i) Two (2) Color Chip Mold Machines, identified as M-2 and M-3, constructed in 1997, with maximum capacity of 100 pounds per hour each, using a dust collector (DC-2) for particulate control, exhausting to stack S-2;

(j) One (1) Aspiration Separator Unit, identified as A-1, constructed in 1997, with a maximum operating capacity of 3,000 pounds per hour of VLF pellets, and a flow rate of 7,200 acfm, using a dust collector (DC-3) as control, exhausting to stack S-4;

(k) Two (2) Pyrolysis Ovens:

(1) One (1) IGG-17L Pyrolysis Oven, identified as PF-1, constructed in 1997, with a maximum heat input of 0.95 MMBTU/hr, burning natural gas, processing less than 50 pounds per hour of plastic, and exhausting to stack S-3. The pyrolysis oven operates in batch mode at a maximum of one (1) 8-hour cycle per day and is used to clean, by thermal decomposition, the plastic resin on the extruder screws;

(2) One (1) PCP Model G2T Pyrolysis Oven, identified as PF-2, constructed in 2008, with a maximum heat input of 0.475 MMBTU/hr, burning natural gas, processing a maximum of 10 pounds per hour of plastic, and exhausting to stack S-10. The pyrolysis oven operates in batch mode at a maximum of two (2) 4-hour cycles per day and is used to clean, by thermal decomposition, the plastic resin on the plastic extrusion dies.

(l) Ten (10) natural gas-fired heaters;

(1) Eight (8) natural gas-fired heaters, constructed in 1997, each with a maximum capacity of 0.25 MMBtu per hour; and

(2) Two (2) natural gas-fired heaters, constructed in 2012, each with a maximum capacity of 2.63 MMBtu per hour.

Emission Units and Pollution Control Equipment Removed From the Source

No emission units have been removed from the source, as a part of this renewal.

Existing Approvals

The source was issued MSOP Renewal No. M097-21096-00316 on February 18, 2009. The source has since received the following approval:

MSOP Administrative Amendment No. 097-37085-00316 on July 8, 2016.

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Marion County, not in Center, Perry, Wayne townships, or the part of the city of Indianapolis bounded by 11th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east.

Pollutant	Designation
SO_2	Nonattainment effective October 4, 2013, for the 2010 SO2 standard for Center, Perry, and Wayne townships. 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 11th 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_3	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.1
$PM_{2.5}$	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM2.5 standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM2.5 standard.
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO2 standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.
1Attainment 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.	

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

(b) $PM_{2.5}$
Marion County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) 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

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants 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.

Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
Process/ Emission Unit	PM	PM10*	PM2.5**	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Pyrolysis Ovens	2.99	2.99	2.99	0.01	0.12	3.83	10.95	-	-
Production Blending & Extrusion	35.92	35.92	35.92	-	-	6.79	-	6.61	4.60 (Styrene)
R & D Blending, Extrusion, & Injection Molding	3.39	3.39	3.39	-	-	0.64	-	0.62	0.43 (Styrene)
VLF Air Classification	3.89	3.89	3.89	-	-	-	-	-	-
VLF Extrusion	0.98	0.98	0.98	-	-	2.54	-	-	-
Natural Gas Combustion	0.06	0.24	0.24	0.02	3.12	0.17	2.62	0.06	0.056 (Hexane)
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
Total PTE of Entire Source Including Fugitives	47.23	47.41	47.41	0.03	3.24	13.97	13.57	7.33	5.09 (Styrene)
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
MSOP Threshold	25	25	25	25	25	25	-	-	-

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

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

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all regulated pollutants is less than 100 tons per year. However, PM, PM10, and PM2.5 is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.

Potential to Emit After Issuance

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

	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
Process/ Emission Unit	PM	PM10*	PM2.5**	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Pyrolysis Ovens	2.99	2.99	2.99	0.01	0.12	3.83	10.95	-	-
Production Blending & Extrusion	35.92	35.92	35.92	-	-	6.79	-	6.61	4.60 (Styrene)
R & D Blending, Extrusion, & Injection Molding	3.39	3.39	3.39	-	-	0.64	-	0.62	0.43 (Styrene)
VLF Air Classification	3.89	3.89	3.89	-	-	-	-	-	-
VLF Extrusion	0.98	0.98	0.98	-	-	2.54	-	-	-
Natural Gas Combustion	0.06	0.24	0.24	0.02	3.12	0.17	2.62	0.06	0.056 (Hexane)
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
Total PTE of Entire Source Including Fugitives	47.23	47.41	47.41	0.03	3.24	13.97	13.57	7.33	5.09 (Styrene)
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
MSOP Threshold	25	25	25	25	25	25	-	-	-

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

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability

Compliance Assurance Monitoring (CAM):

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:

(1) has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

(b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.

(c) Pursuant to 40 CFR 64.2(b)(1)(iii), Acid Rain requirements pursuant to Sections 404, 405, 406, 407(a), 407(b), or 410 of the Clean Air Act are exempt emission limitations or standards. Therefore, CAM was not evaluated for emission limitations or standards for SO_2 and NO_X under the Acid Rain Program.

(d) Pursuant to 40 CFR 64.3(d), if a continuous emission monitoring system (CEMS) is required pursuant to other federal or state authority, the owner or operator shall use the CEMS to satisfy the requirements of CAM according to the criteria contained in 40 CFR 64.3(d).

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

New Source Performance Standards (NSPS)

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAPs)

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

The existing permit indicated that this source is subject to 326 IAC 6-3. However, pursuant to 326 IAC 6-3-1(c)(3), this rule shall not apply if a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in 326 IAC 6-3. This source is located in Marion County, which is one of the listed counties in 326 IAC 6.5

This source is subject to 326 IAC 6.5 (Particulate Matter Limitations Except Lake County) as explained below. Therefore, the requirements under 326 IAC 6-3 will be deleted and not carried over in the renewal.

This requirement was re-evaluated as a part of this renewal no.: 097-40626-00316.

326 IAC 6.5 (PM 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 is located in Marion County, and has the potential to emit ten (10) tons or more of particulate matter (PM) and is not taking a limit of less than ten (10) tons of particulate matter (PM). Therefore, 326 IAC 6.5 applies and the requirements are included in the permit.

This is a new applicable requirement for this renewal no.: 097-40626-00316.

326 IAC 6.8 PM Limitations for Lake County
This source is not subject to 326 IAC 6.8 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of facility will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

Extruders

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. The extruders were not in existence on or before June 11, 1973. Therefore, pursuant to 6.5-1-2(a), PM emissions from the the extruders, identified as I-1, I-2, I-6, I-7, I-8, I-11, I-12, I-13, I-15, I-17, I-18, I-19, I-20, and I-21, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

Based on the calculations, the inlet PM emissions from the extruders are below three-hundredths (0.03) grain per dry standard cubic foot (dscf). Therefore, the extruders can comply without the use of particulate control.

Resin Pre-Mixers

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. The resin pre-mixers were not in existence on or before June 11, 1973. Therefore, pursuant to 6.5-1-2(a), PM emissions from the resin pre-mixers, identified as B-00, B-1, B-3, B-6, B-7, B-10, and B-11, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

Based on the calculations, the inlet PM emissions from each of the resin pre-mixers are below three-hundredths (0.03) grain per dry standard cubic foot (dscf). Therefore, the resin pre-mixers can comply without the use of particulate control.

Resin Post-Mixers

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. The resin post-mixers were not in existence on or before June 11, 1973. Therefore, pursuant to 6.5-1-2(a), PM emissions from the resin post-mixers, identified as B-12, B-13, B-14, B-15, and B-16 shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

Based on the calculations, the inlet PM emissions from each of the resin post-mixers are below three-hundredths (0.03) grain per dry standard cubic foot (dscf). Therefore, the resin post-mixers can comply without the use of particulate control.

Electric Resin Dryer

The electric resin dryer, identified as D-1, is not subject to any rules because there are no potential emissions from the press operations.

Pigment Weigh Hood

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. The pigment weigh hood was not in existence on or before June 11, 1973. Therefore, pursuant to 6.5-1-2(a), PM emissions from the pigment weigh hood, identified as H-1, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

Based on the calculations, the inlet PM emissions from the pigment weigh hood are below three-hundredths (0.03) grain per dry standard cubic foot (dscf). Therefore, the pigment weigh hood can comply without the use of particulate control.

Scale Station

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. The scale station was not in existence on or before June 11, 1973. Therefore, pursuant to 6.5-1-2(a), PM emissions from the scale station, identified as H-2, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

Based on the calculations, the inlet PM emissions from the scale station are below three-hundredths (0.03) grain per dry standard cubic foot (dscf). Therefore, the scale station can comply without the use of particulate control.

Mold Machines

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. The mold machines were not in existence on or before June 11, 1973. Therefore, pursuant to 6.5-1-2(a), PM emissions from the mold machines, as M-1a, M-1c, M-1d, M-2 and M-3, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

Based on the calculations, the inlet PM emissions from the mold machines are below three-hundredths (0.03) grain per dry standard cubic foot (dscf). Therefore, the mold machines can comply without the use of particulate control.

Aspiration Separator Unit

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. The aspiration separator was not in existence on or before June 11, 1973. Therefore, pursuant to 6.5-1-2(a), PM emissions from the aspiration separator, identified as A-1, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

Based on the calculations, the inlet PM emissions from the aspiration separator are below three-hundredths (0.03) grain per dry standard cubic foot (dscf). Therefore, the aspiration separator can comply without the use of particulate control.

The table below summarizes the inlet grain loading of each stack indicating compliance without the use of controls.

Stack ID	Inlet Grain Loading (grains/dscf)
S-1	0.021
S-2	0.012
S-4	0.006
S-5a, S-5b, S-6a, S-6b, S-7a, S-7b	0.001 to 0.003
S-8a, S-8b, S-9a, S-9b	0.0003 to 0.008

Pyrolysis Ovens

326 IAC 4-2 (Incinerators)
Pursuant to 326 IAC 4-2-1, the pyrolysis ovens, identified as PF-1 and PF-2, are subject to 326 IAC 4-2 (Incinerators) because this unit is considered an incinerator.

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

(a) All incinerators shall comply with the following requirements:

(1) Consist of primary and secondary chambers or the equivalent.

(2) Be equipped with a primary burner unless burning only wood products.

(3) Comply with 326 IAC 5-1 (Opacity Limitations) and 326 IAC 2 (Permit Review Rules).

(4) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in subsection (c).

(5) Not emit particulate matter in excess of one (1) of the following:

(A) Three-tenths (0.3) pound 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 a maximum solid waste capacity of greater than or equal to two hundred (200) pounds per hour.

(B) Five-tenths (0.5) pound 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 less than two hundred (200) pounds per hour.

(6) If any of the requirements of subdivisions (1) through (5) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

(b) An incinerator is exempt from subsection (a)(5) if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P, State Implementation Plan for Indiana.

(c) An owner or operator developing an operation and maintenance plan pursuant to subsection (a)(4) must comply with the following:

(1) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in subsection (a)(5) and include the following:

(A) Procedures for receiving, handling, and charging waste.

(B) Procedures for incinerator startup and shutdown.

(C) Procedures for responding to a malfunction.

(D) Procedures for maintaining proper combustion air supply levels.

(E) Procedures for operating the incinerator and associated air pollution control systems.

(F) Procedures for handling ash.

(G) A list of wastes that can be burned in the incinerator.

(2) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.

(3) The operation and maintenance plan must be readily accessible to incinerator operators.

(4) The owner or operator of the incinerator shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.

(d) The owner or operator of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The pyrolysis ovens, identified as PF-1 and PF-2, are not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), because the ovens are not indirect heating units.

326 IAC 6.5 (PM Limitations Except Lake County)
The pyrolysis ovens, identified as PF-1 and PF-2, are not subject to 326 IAC 6.5 2 because the ovens are are subject to 326 IAC 4-2.

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)
The pyrolysis ovens, identified as PF-1 and PF-2, are not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide is less than twenty-five (25) tons per year and ten (10) pounds per hour. Therefore, the requirements of 326 IAC 7-1.1-1 are not included for the pyrolysis ovens.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
The pyrolysis ovens, identified as PF-1 and PF-2, are not subject to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), because the potential to emit VOC is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not included for the pyrolysis ovens.

326 IAC 10-1-1 (Nitrogen Oxides Control)
The pyrolysis ovens, identified as PF-1 and PF-2, are not subject to 326 IAC 10-1-1 (Nitrogen Oxides Control) because the source is not located in Clark or Floyd counties. Therefore, the requirements of 326 IAC 10-1-1 are not included for the pryolysis ovens.

Natural Gas-fired Heaters

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The natural gas-fired heaters are not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), because the heaters are not indirect heating units.

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. The natural gas-fired heaters were not in existence on or before June 11, 1973. Therefore, pursuant to 6.5-1-2(a), PM emissions from the natural gas-fired heaters shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

Based on the calculations, the inlet PM emissions from the natural gas-fired heaters are below seven hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf). Therefore, the natural gas-fired heaters can comply without the use of particulate control.

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)
The natural gas-fired heaters are not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide is less than twenty-five (25) tons per year and ten (10) pounds per hour. Therefore, the requirements of 326 IAC 7-1.1-1 are not included for the heaters.

326 IAC 9-1-1 (Carbon Monoxide Emission Limits)
The natural gas-fired heaters are not subject to 326 IAC 9-1-1 (Carbon Monoxide Emission Limits) because there is no applicable emission limits for the source under 326 IAC 9-1-2.

326 IAC 10-1-1 (Nitrogen Oxides Control)
The natural gas-fired heaters are not subject to 326 IAC 10-1-1 (Nitrogen Oxides Control) because the source is not located in Clark or Floyd counties. Therefore, the requirements of 326 IAC 10-1-1 are not included for the heaters.

Compliance Determination and Monitoring Requirements

There are no compliance requirements applicable to this source.

There are no testing requirements applicable to this source.

Proposed Changes

As part of this permit approval, the permit may contain new or different permit conditions and some conditions from previously issued permits/approvals may have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes.

The following changes were made to conditions contained previously issued permits/approvals (these changes may include Title I changes):

(1) The source is subject to 326 IAC 6.5. This source is located in Marion County, and has the potential to emit ten (10) tons or more of particulate matter (PM) and is not taking a limit of less than ten (10) tons of particulate matter (PM). Therefore, 326 IAC 6.5 applies and the requirements are included in the permit.

In previous approvals, the dust collectors, identified as DC-1 and DC-2, were required to be in use to render 326 IAC 6.5 not applicable. This is no longer the case.

(2) Since the dust collectors, identified as DC-1 and DC-2, are no longer required to be in use to render 326 IAC 6.5 not applicable, records of visible emission notations for their respective stacks, identified as S-1 and S-2, are no longer required.

(3) The following emission units are no longer subject to the particulate emission limitations of 326 IAC 6-3-2:

Emission Unit ID	Process Weight Rate (tons/hr)	Allowable PM emissions (lbs/hr)
Extruder, ID I-1	0.25	1.62
Extruder, ID I-2	0.25	1.62
Extruder, ID I-6	0.50	2.58
Extruder, ID I-7	0.45	2.40
Extruder, ID I-8	0.45	2.40
Extruder, ID I-11	1.10	4.37
Extruder, ID I-12	1.10	4.37
Extruder, ID I-13	0.125	1.02
Extruder, ID I-15	0.05	0.55
Resin pre-mixer, ID B-00	0.05	0.55
Resin pre-mixer, ID B-1	0.70	3.23
Resin pre-mixer, ID B-3	0.70	3.23
Resin pre-mixer, ID B-6	0.70	3.23
Resin pre-mixer, ID B-7	0.70	3.23
Resin pre-mixer, ID B-10	0.50	2.58
Resin pre-mixer, ID B-11	1.10	4.37

Pursuant to 326 IAC 6-3-1(c)(3), this rule shall not apply if a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in 326 IAC 6-3. As described in the State Rule Applicability – Individual Facilities section, the above emission units are now subject to 326 IAC 6.5 (Particulate Matter Limitations Except Lake County) as a part of this renewal.

Conclusion and Recommendation

The staff recommends to the Commissioner that the MSOP Renewal be approved. This recommendation is based on the following facts and conditions:
Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on October 24, 2018.

The operation of this stationary thermoplastic compounding operation shall be subject to the conditions of the attached MSOP Renewal No. 097-40626-00316.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Jeries Smirat, 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) 234-5374 or (800) 451-6027, and ask for Jeries Smirat or (317) 234-5374.

(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: Emissions Calculations

Company Name: RTP Company
Address City IN Zip: 8111 Zionsville Road, Indianapolis, IN 46268
MSOP Renewal No.: M097-40626-00316
Permit Reviewer: Jeries Smirat

Uncontrolled Emissions Before Amendment (tons/year)										
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NOx**	**VOC**	**CO**	**Total HAPs**	**Single HAP**	
Pyrolysis Ovens[(1)]	2.99	2.99	2.99	0.01	0.12	3.83	10.95	-	-	
Production and Blending & Extrusion	35.92	35.92	35.92	-	-	6.79	-	6.61	4.60	Styrene
R& D Blending, Extrusions, & Injection Moding	3.94	3.94	3.94	-	-	0.75	-	0.73	0.50	Styrene
VLF Air Clasification	3.89	3.89	3.89	-	-	-	-	-	-	-
VLF Extrusion	0.98	0.98	0.98	-		2.54	-	0.03	0.0001	Styrene
Natural Gas Combustion	0.02	0.07	0.067	0.01	0.88	0.05	0.736	0.016	0.016	Hexane
Total	**47.74**	**47.79**	**47.79**	**0.01**	**0.99**	**13.95**	**11.69**	**7.39**	**5.12**	**Styrene**

Uncontrolled Emissions After Amendment (tons/year)										
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NOx**	**VOC**	**CO**	**Total HAPs**	**Single HAP**	
Pyrolysis Ovens[(1)]	2.99	2.99	2.99	0.01	0.12	3.83	10.95	-	-	
Production and Blending & Extrusion	35.92	35.92	35.92	-	-	6.79	-	6.61	4.60	Styrene
R& D Blending, Extrusions, & Injection Moding	3.39	3.39	3.39	-	-	0.64	-	0.62	0.43	Styrene
VLF Air Clasification	3.89	3.89	3.89	-	-	-	-	-	-	-
VLF Extrusion	0.98	0.98	0.98	-	-	2.54	-	0.03	0.0001	Styrene
Natural Gas Combustion	0.06	0.24	0.24	0.02	3.12	0.17	2.62	0.06	0.056	Hexane
Total	**47.23**	**47.41**	**47.41**	**0.03**	**3.24**	**13.97**	**13.57**	**7.33**	**5.09**	**Styrene**

(1) Each Pyrolysis Oven operation is a Batch Operation - maximum of 8 hours per day, maximum 2 days per week. Conservative uncontrolled emission estimate is made based on Manufacturer specified lb/hr emission rate after control and Afterburner efficiency at a maximum of 2,920 (8 * 365) hours of operation per year. Controlled emission estimate is based on Manufacturer specified lb/hr emission rate after control at a maximum of 2,920 hours of operation per year.

Appendix A: Emissions Calculations

Company Name: RTP Company
Address City IN Zip: 8111 Zionsville Road, Indianapolis, IN 46268
MSOP Renewal No.: M097-40626-00316
Permit Reviewer: Jeries Smirat

Emission Unit#s	Stack ID	Emission Unit Description **Type of Emission Factor** Hourly Capacity of Unit	Potential Pollutant(s)	Source of Emission Factor	Emission Factor Units	A Uncontrolled Emission Factor (lb emitted/million lb resin extruded)	B Maximum Production Rate (lbs/hr)	C Uncontrolled Potential Emissions A x B (lb/hr)	D Control Efficiency (%)	E Controlled Potential Emissions C x (100-D) (lb/hr)	F Controlled Potential Emissions E x 24 (lb/day)	G Controlled Potential Emissions E x 8760 / 2000 (ton/yr)	H Uncontrolled Potential Emissions C x 8760 / 2000 (ton/yr)	I Uncontrolled Potential Emissions 6.5 Limit (g/dscf)
I-1, I-2, I-6 , I-7, I-8, I-11 & I-12 AND B-00,B-1, B-3, B-6, B-7, B-10, B-11	S-1 Dry standard cubic feet/minute 45000	**Production Blending and Extrusion of Specialty Plastic Resins in 6 Blenders and 9 Extruders** ***Site Specific Emission Factor, from mass balance and particle size distribution analysis** **AWMA Emission Factors** EF Unit = 1,000,000 lbs 8,200 lb/hr total throughput capacity 8,200 / 1,000,000 = 0.0082 10^6 lb/hr ****Highest Single HAP**	**PM/PM10**	*Site Specific	10^6 lb	1000.0	8200	8.200	99%	0.0820	1.97	**0.359**	**35.916**	0.021
			Antimony	3.0% of PM	10^6 lb	30.0	8200	0.246	99%	0.00	0.059	0.0108	1.077	
			Cadmium	0.5% of PM	10^6 lb	5.0	8200	0.041	99%	0.00	0.0098	0.0018	0.180	
			Chromium	0.5% of PM	10^6 lb	5.0	8200	0.041	99%	0.00	0.0098	0.0018	0.180	
			Cobalt	0.5% of PM	10^6 lb	5.0	8200	0.041	99%	0.00	0.0098	0.0018	0.180	
			Lead	0.5% of PM	10^6 lb	5.0	8200	0.041	99%	0.00	0.0098	0.0018	0.180	
			Total PM HAP	**3.5% of PM**	**10^6 lb**	**35.0**	**8200**	**0.287**	**99%**	**0.00**	**0.0689**	**0.0126**	**1.257**	
			VOC	**AWMA Journal**	**10^6 lb**	**189**	**8200**	**1.550**	**0%**	**1.55**	**37.20**	**6.788**	**6.788**	
			Formaldehyde	Resin Manufacturer	10^6 lb	50	8200	0.410	0%	0.41	9.84	1.796	1.796	
			Acrolein		10^6 lb	0.07	8200	0.001	0%	0.00	0.01	0.003	0.003	
			Acetaldehyde		10^6 lb	4.43	8200	0.036	0%	0.0363	0.87	0.159	0.159	
			Propionaldehyde	1996 AWMA Journal	10^6 lb	3.26	8200	0.027	0%	0.0267	0.64	0.117	0.117	
			Styrene**	**WebFIRE**	**10^6 lb**	**128.15**	**8200**	**1.051**	**0%**	**1.0508**	**25.22**	**4.603**	**4.603**	
			Acrylonitrile		10^6 lb	7.79	8200	0.064	0%	0.0639	1.53	0.280	0.280	
			Acetophenone		10^6 lb	9.29	8200	0.076	0%	0.0762	1.83	0.334	0.334	
			Ethylbenzene	1995 AWMA Journal	10^6 lb	6.02	8200	0.049	0%	0.0494	1.18	0.216	0.216	
			Total VOHAP	Worst Case Resin	10^6 lb	149.1	8200	1.223	0%	1.2226	29.34	**5.355**	**5.355**	
I-13, I-15 H-1, H-2 D-1 M-1a, M-1c, M-1d, M-2, M-3	S-2 Dry standard cubic feet/minute 7500	**Blending, Extrusion and Injection Molding of Specialty Plastic Resins in 2 R&D Extruders and 4 Injection Molding Machines for Research, Development and Testing** ***Site Specific Emission Factor, from mass balance and particle size distribution analysis** **AWMA Emission Factors** 775 lb/hr total throughput capacity 775 / 1,000,000 = 0.000775 10^6 lb/hr ****Highest Single HAP**	**PM/PM10**	Site Specific*	10^6 lb	1000.0	**775**	0.775	99%	0.0078	0.19	**0.034**	**3.395**	0.012
			Antimony	3.0% of PM	10^6 lb	30.0	**775**	0.0233	99%	2.33E-04	0.00558	0.001018	0.1018	
			Cadmium	0.5% of PM	10^6 lb	5.0	**775**	0.0039	99%	3.88E-05	0.00093	0.000170	0.0170	
			Chromium	0.5% of PM	10^6 lb	5.0	**775**	0.0039	99%	3.88E-05	0.00093	0.000170	0.0170	
			Cobalt	0.5% of PM	10^6 lb	5.0	**775**	0.0039	99%	3.88E-05	0.00093	0.000170	0.0170	
			Lead	0.5% of PM	10^6 lb	5.0	**775**	0.0039	99%	3.88E-05	0.00093	0.000170	0.0170	
			Total PM HAP	3.5% of PM	10^6 lb	35.0	**775**	0.027	99%	2.71E-04	0.0065	**0.0012**	**0.119**	
			VOC	AWMA Journal	10^6 lb	189	**775**	0.1465	0%	0.146475	3.52	**0.642**	**0.642**	
			Formaldehyde	Resin Manufacturer	10^6 lb	50	**775**	0.039	0%	0.03875	0.93	0.170	0.170	
			Acrolein		10^6 lb	0.07	**775**	0.000	0%	5.43E-05	0.001	0.0002	0.0002	
			Acetaldehyde		10^6 lb	4.43	**775**	0.003	0%	0.0034	0.08	0.015	0.015	
			Propionaldehyde	1996 AWMA Journal	10^6 lb	3.26	**775**	0.003	0%	0.0025	0.06	0.011	0.011	
			Styrene**		**10^6 lb**	**126**	**775**	0.098	**0%**	**0.0977**	**2.34**	**0.428**	**0.428**	
			Acrylonitrile		10^6 lb	7.79	**775**	0.006	0%	0.0060	0.14	0.026	0.026	
			Acetophenone		10^6 lb	9.29	**775**	0.007	0%	0.0072	0.17	0.032	0.032	
			Ethylbenzene	1995 AWMA Journal	10^6 lb	6.02	**775**	0.005	0%	0.0047	0.11	0.020	0.020	
			Total VOHAP	Worst Case Resin	10^6 lb	149.1	**775**	0.1156	0%	0.1156	2.77	**0.506**	**0.506**	

Appendix A: Emissions Calculations

Company Name: RTP Company
Address City IN Zip: 8111 Zionsville Road, Indianapolis, IN 46268
MSOP Renewal No.: M097-40626-00316
Permit Reviewer: Jeries Smirat

Emission Unit#s	Stack ID	Emission Unit Description **Type of Emission Factor** Hourly Capacity of Unit	Potential Pollutant(s)	Source of Emission Factor	Emission Factor Units	A Uncontrolled Emission Factor (lb emitted/million lb resin extruded)	B Maximum Production Rate (lbs/hr)	C Uncontrolled Potential Emissions A x B (lb/hr)	D Control Efficiency (%)	E Controlled Potential Emissions C x (100-D) (lb/hr)	F Controlled Potential Emissions E x 24 (lb/day)	G Controlled Potential Emissions E x 8760 / 2000 (ton/yr)	H Uncontrolled Potential Emissions C x 8760 / 2000 (ton/yr)	I Uncontrolled Potential Emissions 6.5 Limit (g/dscf)
A-1	S-4 Dry standard cubic feet/minute 7200	**Aspiration Separator Unit** **Site Specific Emission Factor** Operating data: 0.1% of throughput to DC-3 Particle size analysis: 12% PM EF = 1000(.12) = 120 10^6 lb/hr 3000 lb/hr total throughput capacity 3,000 / 1,000,000 = 0.0030 10^6 lb/hr	**PM/PM10**	Site Specific	10^6 lb	120.0	3000	0.36	99.0%	0.0036	0.086	**0.016**	**1.577**	0.006
I-17, I-18, I-19	S-5a, S-5b, S-6a, S-6b, S-7a, S-7b Dry standard cubic feet/minute 11000	**Air classification of Long Fibers with dust collection control (plastic + glass)** **Site Specific Emission Factor** 120 lb/1,000,000 lb = 120 lb per 10^6 lb 2300 lb/hr total product throughput capacity 2300 / 1,000,000 = 0.0023 x 10^6 lb/hr	**PM/PM10**	Site Specific (from process mass balance and particle size distribution analysis)	10^6 lb	120.0	2300	0.276	99.0%	0.0028	0.066	**0.0121**	**1.209**	0.003
I-17, I-18, I-19	S-5a, S-5b, S-6a, S-6b, S-7a, S-7b Dry standard cubic feet/minute 11000	**Extrusion onto Long Fibers (glass, graphite carbon, Kevlar, or stainless steel) with polypropylene or nylon resin** **Emission Factor - AWMA Journal Polypropylene Extrusion** 2020 lb/hr total plastic resin thruput capacity 2020 / 1,000,000 = 0.00202 x 10^6 lb/hr	**PM/PM10** **VOC** Formaldehyde Acrolein Acetaldehyde Propionaldehyde Styrene **Total VOHAP**	1999 AWMA Journal 1999 AWMA Journal " " " 1999 AWMA Journal	10^6 lb 10^6 lb 10^6 lb 10^6 lb 10^6 lb 10^6 lb 10^6 lb 10^6 lb	68.4 177 1.38 0.05 0.54 0.07 0.01 2.1	2020 2020 2020 2020 2020 2020 2020 2020	0.138 0.358 0.002788 0.000101 0.001091 0.000141 0.000020 0.004141	0.0% 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% 0.0%	0.1382 0.3575 0.00279 0.00010 0.00109 0.00014 0.00002 0.00414	3.32 8.58 0.06690 0.00242 0.02618 0.00339 0.00048 0.09938	**0.605** **1.566** 0.01221 0.00044 0.00478 0.00062 0.00009 **0.01814**	**0.605** **1.566** 0.01221 0.00044 0.00478 0.00062 0.00009 **0.01814**	0.001
I-20, I-21	S-8a, S-8b, S-9a, S-9b Dry standard cubic feet/minute 3800	**Air classification of Long Fibers with dust collection control (plastic + glass)** ***Site Specific Emission Factor** 120 lb/1,000,000 lb = 120 lb per 10^6 lb 2100 lb/hr total product throughput capacity 2100 / 1,000,000 = 0.0021 x 10^6 lb/hr	**PM/PM10**	Site Specific* (from process mass balance and particle size distribution analysis)	10^6 lb	120.0	2100	0.252	99.0%	0.0025	0.060	**0.0110**	**1.104**	0.008

Appendix A: Emissions Calculations

Company Name: RTP Company
Address City IN Zip: 8111 Zionsville Road, Indianapolis, IN 46268
MSOP Renewal No.: M097-40626-00316
Permit Reviewer: Jeries Smirat

Emission Unit#s	Stack ID	Emission Unit Description **Type of Emission Factor** Hourly Capacity of Unit	Potential Pollutant(s)	Source of Emission Factor	Emission Factor Units	A Uncontrolled Emission Factor (lb emitted/million lb resin extruded)	B Maximum Production Rate (lbs/hr)	C Uncontrolled Potential Emissions A x B (lb/hr)	D Control Efficiency (%)	E Controlled Potential Emissions C x (100-D) (lb/hr)	F Controlled Potential Emissions E x 24 (lb/day)	G Controlled Potential Emissions E x 8760 / 2000 (ton/yr)	H Uncontrolled Potential Emissions C x 8760 / 2000 (ton/yr)	I Uncontrolled Potential Emissions 6.5 Limit (g/dscf)
I-20, I-21	S-8a, S-8b, S-9a, S-9b Dry standard cubic feet/minute 3800	**Extrusion onto Long Fibers (glass, graphite carbon, Kevlar, or stainless steel) with polypropylene or nylon resin**	**PM/PM10**	1999 AWMA Journal	10^6 lb	68.4	1260	0.086	0.0%	0.0862	2.07	**0.377**	**0.377**	0.003
			VOC		10^6 lb	177	1260	0.223	0.0%	0.2230	5.35	**0.977**	**0.977**	
		Emission Factor - AWMA Journal Polypropylene Extrusion 1260 lb/hr total plastic resin thruput capacity 1260 / 1,000,000 = 0.00126 x 10^6 lb/hr	Formaldehyde	1999 AWMA Journal	10^6 lb	1.38	1260	0.002	0.0%	0.00174	0.04173	0.00762	0.00762	
			Acrolein	"	10^6 lb	0.05	1260	0.000	0.0%	0.00006	0.00151	0.00028	0.00028	
			Acetaldehyde	"	10^6 lb	0.54	1260	0.001	0.0%	0.00068	0.01633	0.00298	0.00298	
			Propionaldehyde	"	10^6 lb	0.07	1260	0.000	0.0%	0.00009	0.00212	0.00039	0.00039	
			Styrene	"	10^6 lb	0.01	1260	0.000	0.0%	0.00001	0.00030	0.00006	0.00006	
			Total VOHAP	1999 AWMA Journal	10^6 lb	2.1	1260	0.003	0.0%	0.00258	0.06199	**0.01131**	**0.01131**	
All		**Plantwide Totals (including pyrolysis oven)**	**PM**					10.09		0.32	7.75	1.41	44.18	
			PM10*					10.087		0.323	7.752	1.415	44.18	
			Antimony					0.269		0.003	0.065	0.012	1.179	
			Cadmium					0.045		0.000	0.011	0.002	0.197	
			Chromium					0.045		0.000	0.011	0.002	0.197	
			Cobalt					0.045		0.000	0.011	0.002	0.197	
			Lead					0.045		0.000	0.011	0.002	0.197	
			Total PM HAP					0.314		0.003	0.075	**0.014**	1.376	
			VOC					2.28		2.28	54.64	9.97	9.973	
			Formaldehyde					0.453		0.453	10.879	1.99	1.99	
			Acrolein					0.00079		0.00079	0.01901	0.00347	0.00347	
			Acetaldehyde					0.042		0.042	0.997	0.182	0.182	
			Propionaldehyde					0.029		0.029	0.708	0.129	0.129	
		****Highest Single HAP**	**Styrene****					**1.149**		**1.149**	**27.564**	**5.03**	**5.03**	
			Acrylonitrile					0.070		0.070	1.678	0.306	0.306	
			Acetophenone					0.083		0.083	2.001	0.365	0.365	
			Ethylbenzene					0.054		0.054	1.297	0.237	0.237	
			Total VO HAP					1.345		1.345	32.278	**5.89**	**5.89**	
			Total HAP					1.66		1.35	32.35	**5.90**	**7.27**	

* For all other emission units PM is assumed to equal PM10.

Appendix A: Emissions Calculations

Company Name: RTP Company
Address City IN Zip: 8111 Zionsville Road, Indianapolis, IN 46268
MSOP Renewal No.: M097-40626-00316
Permit Reviewer: Jeries Smirat

Table 1
Table of Comparison of Available Emission Factor Data for Plastic Extrusion
Various Sources and Resins as Noted
(lb emitted/million lb resin extruded)

Emission Factor Source	Resin Manufacturer	SCC 30101821 WebFIRE Database	AWMA Journal*		
			1995	Jun-96	Jun-96
Resin Type	Acetal	PS	ABS	HDPE	LDPE
Pollutants					
PM				26.63	242.2
VOC	50	150	189	38.5	157.4
HAPs:					
Formaldehyde	50			0.06	8.11
Acrolein				ND	0.07
Acetaldehyde				0.05	4.43
Propionaldehyde				ND	3.26
Styrene		128.15	126		
Acrylonitrile			7.79		
Acetophenone			9.29		
Ethylbenzene			6.02		
Total HAP	**50**	**128.15**	**149.1**	**0.11**	**15.87**

ND- Non-detect
Notes:
The emission factors for PM, VOC and HAPs were taken from an article entitled *Development of Emission Factors for Polyethylene Processing* which appeared in the Journal of Air and Waste Management Association, July 1996, Volume 46, pp. 569-580.

Appendix A: Emissions Calculations

Company Name: RTP Company
Address City IN Zip: 8111 Zionsville Road, Indianapolis, IN 46268
MSOP Renewal No.: M097-40626-00316
Permit Reviewer: Jeries Smirat

1. Unit PF-1

	After Control	Efficiency	Batch Operation PTE
	lb/hr		ton/yr
PM	0.027	98.0%	**1.971**
VOC	0.035	98.0%	**2.555**
SO2	0.0036	0.0%	**0.0053**
NOx	0.054	0.0%	**0.079**
CO	0.100	98.0%	**7.300**
	Manufacturer Data		

(1) Pyrolysis Oven operation is a Batch Operation - maximum of 8 hours per day, maximum 2 days per week. Conservative emission estimate is made based on Manufacturer specified lb/hr emission rate after control and Afterburner efficiency.

2. Unit PF-2

	After Control	Efficiency	Batch Operation PTE
	lb/hr		ton/yr
PM	0.014	98.0%	**1.022**
VOC	0.0174	98.0%	**1.270**
SO2	0.0018	0.0%	**0.003**
NOx	0.0271	0.0%	**0.040**
CO	0.050	98.0%	**3.650**
	Manufacturer Data		

Methodology
Emissions (tons/yr) = throughput (lb/hr)/(1-efficiency) x 8 (hours running per day) x 365 (days/year) / 2000 (lb/ton)
Pyrolysis Oven operation is a Batch Operation - maximum of 8 hours per day, maximum 2 days per week. Conservative emission estimate is made based on Manufacturer specified lb/hr emission rate after control and Afterburner efficiency.

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

Company Name: RTP Company
Address City IN Zip: 8111 Zionsville Road, Indianapolis, IN 46268
MSOP Renewal No.: M097-40626-00316
Permit Reviewer: Jeries Smirat

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
0.25		2.15
0.25		2.15
0.25		2.15
0.25		2.15
0.25		2.15
0.25		2.15
0.25		2.15
0.25		2.15
2.63		22.59
2.63		22.59
7.3	1020	62.4

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.06	0.24	0.24	0.02	3.12	0.17	2.62

*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	6.5E-05	3.7E-05	2.3E-03	0.06	1.1E-04	**0.06**

	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	1.6E-05	3.4E-05	4.4E-05	1.2E-05	6.5E-05	**1.7E-04**
					Total HAPs	**0.06**
					Worst HAP	**0.06**

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
Cincinnati Molding Machine (M-1c)

Company Name: RTP Company
Address City IN Zip: 8111 Zionsville Road, Indianapolis, IN 46268
MSOP Renewal No.: M097-40626-00316
Permit Reviewer: Jeries Smirat

Bar Mold Machine (M-1c)

Entire Process - Polypropylene and Coploymers Pollutant	SCC	Emission Factor lb/ton	Emission Factor Reference	Throughput lb/hr	Uncontrolled Emissions lb/hr	 tons/yr
PM_{fil}	30101802	3.00	Webfire	10	0.02	0.07
$PM10_{fil}$	30101802	2.00	Webfire	10	0.01	0.04
$PM2.5_{fil}$	30101802	1.506	EPA PM Calculator	10	0.01	0.03
PM_{con}	30101802	0.64	EPA PM Calculator	10	0.00	0.01
VOC	30101802	0.70	Webfire	10	0.00	0.02

Methodology
Emission (lb/hr) = Throughput (lb/hr) x Emission factor (lb/ton)/2,000 (lb/ton)
Emission (tons/yr) = Throughput (lb/hr) x Emission factor (lb/ton) x 8760 (hours) /2,000 (lb/ton)

Appendix A: Emissions Calculations

Cincinnati Molding Machine (M-1d)

Company Name: RTP Company
Address City IN Zip: 8111 Zionsville Road, Indianapolis, IN 46268
MSOP Renewal No.: M097-40626-00316
Permit Reviewer: Jeries Smirat

Bar Mold Machine (M-1d)

Entire Process - Polypropylene and Coploymers	SCC	Emission Factor	Emission Factor	Throughput	Uncontrolled Emissions	
Pollutant		lb/ton	Reference	lb/hr	lb/hr	tons/yr
PM_{fil}	30101802	3.00	Webfire	10	0.02	0.07
$PM10_{fil}$	30101802	2.00	Webfire	10	0.01	0.04
$PM2.5_{fil}$	30101802	1.506	EPA PM Calculator	10	0.01	0.03
PM_{con}	30101802	0.64	EPA PM Calculator	10	0.00	0.01
VOC	30101802	0.70	Webfire	10	0.00	0.02

Methodology

Emission (lb/hr) = Throughput (lb/hr) x Emission factor (lb/ton)/2,000 (lb/ton)

Emission (tons/yr) = Throughput (lb/hr) x Emission factor (lb/ton) x 8760 (hours) /2,000 (lb/ton)

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

Company Name: RTP Company
Address City IN Zip: 8111 Zionsville Road, Indianapolis, IN 46268
MSOP Renewal No.: M097-40626-00316
Permit Reviewer: Jeries Smirat

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
2.63		22.59
2.63		22.59
5.3	1020	45.2

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.04	0.17	0.17	0.01	2.26	0.12	1.90

*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	1.80	3.4E-03	
Potential Emission in tons/yr	4.7E-05	2.7E-05	1.7E-03	0.04	7.7E-05	**0.04**

	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	1.1E-05	2.5E-05	3.2E-05	8.6E-06	4.7E-05	**1.2E-04**
					Total HAPs	**0.04**
					Worst HAP	**0.04**

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

January 7, 2019

Chuck Hess
RTP COMPANY
8111 Zionsville Rd
Indianapolis, IN 46268

Re: Public Notice
RTP Company
Permit Level: MSOP Renewal
Permit Number: Permit Number

Dear Chuck Hess:

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

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Indianapolis Star in Indianapolis, IN publish the abbreviated version of the public notice no later than January 11, 2019. 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 Pike Branch Library, 6525 Zionsville 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 Jeries Smirat, 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 4-5374 or dial (317) 234-5374.

Sincerely,
Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 1/9/2017

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
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Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

January 7, 2019

Indianapolis Star
Attn: Classifieds
130 S. Meridian St.
Indianapolis, Indiana 46225

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for RTP Company, 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 January 11, 2019.

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 Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

Len Pogost

Len Pogost
Permit Branch
Office of Air Quality

Permit Level: MSOP Renewal
Permit Number: 097-40626-00316

Enclosure

PN Newspaper.dot 1/9/2017

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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

January 7, 2019

To: Pike Branch Library 6525 Zionsville Road Indianapolis IN

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: RTP Company
Permit Number: 097-40626-00316

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
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Notice of Public Comment

January 7, 2019
RTP Company
097-40626-00316

Dear Concerned Citizen(s):

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

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

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

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

Enclosure
PN AAA Cover Letter 1/9/2017

Mail Code 61-53

IDEM Staff	LPOGOST 1/7/2019 RTP COMPANY 097-40626-00316 draft/			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

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		Chuck Hess RTP COMPANY 8111 Zionsville Rd Indianapolis IN 46268 (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		Pike Branch Library 6525 Zionsville Road Indianapolis IN 46268 *(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)*									
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