

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
and ENHANCED NEW SOURCE REVIEW (ENSR)
OFFICE OF AIR MANAGEMENT**

**Chemtrusion Indiana, Inc.
1403 Port Road
Jeffersonville, Indiana 47130**

(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 in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F019-9668-00091	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary source, that extrudes polypropylene plastics.

Responsible Official: Mr. Leo A. Visser
Source Address: 1403 Port Road, Jeffersonville, Indiana 47130
Mailing Address: 1403 Port Road, Jeffersonville, Indiana 47130
SIC Code: 3087
County Location: Clark
County Status: Nonattainment area for Ozone
Attainment area for all other criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD Offset Rules;

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

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

- (1) Three (3) preblending operations identified as PB1 through PB3, each with a maximum capacity of 165 pounds of additives and pigments per hour, particulate matter (PM) controlled by a baghouse identified as PS010, exhausting at a stack identified as B;
- (2) One (1) automated feeder system (AFS) receives raw material as additive, pigments, polypropylene resin, rubber, fillers at a maximum rate of 80, 80, 10450, 3215 and 2250 pounds per hour, particulate matter controlled by a baghouse identified as PS009, exhausting at a stack identified as A;
- (3) One (1) extruder identified as EX1B contains different heat zones for polymerization of raw materials, maximum capacity of 330 pounds per hour, exhausting at a stack identified as E;
- (4) One (1) extruder identified as EX2 contains different heat zones for polymerization of raw materials, maximum capacity of 1500 pounds per hour, exhausting at a stack identified as E;
- (5) One (1) extruder identified as EX3 contains different heat zones for polymerization of raw materials, maximum capacity of 1500 pounds per hour, exhausting at a stack identified as E;
- (6) One (1) extruder identified as EX5 contains different heat zones for polymerization of raw materials, maximum capacity of 3300 pounds per hour, exhausting at a stack identified as E;

- (7) One (1) extruder identified as EX6 contains different heat zones for polymerization of raw materials, maximum capacity of 6000 pounds per hour, exhausting at a stack identified as E;
- (8) One (1) pelletizing process identified as P1 with a maximum capacity of 330 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents;
- (9) One (1) pelletizing process identified as P2 with a maximum capacity of 1500 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents;
- (10) One (1) pelletizing process identified as P3 with a maximum capacity of 1500 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents;
- (11) One (1) pelletizing process identified as P5 with a maximum capacity of 3300 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents, exhausting to a stack identified as F;
- (12) One (1) pelletizing process identified as P6 with a maximum capacity of 6000 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents, exhausting to a stack identified as F;
- (13) One (1) extruder identified as EX4 contains different heat zones for polymerization of raw materials, maximum capacity of 3500 pounds per hour, exhausting at a stack identified as E;
- (14) One (1) pelletizing process identified as P4 with a maximum capacity of 3500 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents;

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

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Space heaters, process heaters, or boilers using the following fuels.
 - (A) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
 - (i) Three (3) natural gas fired process heaters identified as OF₁ to OF₃, each rated at 1.20 million British thermal units (mmBtu/hr).
- (2) Cleaners and solvents characterized as follow:
 - (A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.30 psi measured at 38 degrees C (100° F) or;
 - (B) having a vapor pressure equal to or less than 0.70 kPa; 5 mm Hg; or 0.10 psi measured at 20° C (68° F);

The use of which for all cleaners and solvents combined does not exceed 145 gallons per months.

- (3) Natural draft cooling towers not regulated under a NESHAP.
 - (A) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (4) Replacement or repair of electrostatic precipitator, bags in the baghouses and filters in other air filtrations equipment.
- (5) Conveyors as follows:
 - (A) Enclosed systems for conveying plastic raw materials and plastic finished goods.
- (6) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (7) Other activities or categories not previously identified:

Insignificant Thresholds:

Lead (Pb) = 0.60 tons/year or 3.29 lbs/hour
Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxide (SO₂) = 5 lbs/hour or 25 lbs/day
Particulate Matter (PM) = 5 lbs/hour or 25 pounds/day
Volatile Organic Compounds (VOC) = 3 lbs/hour or 15 lbs/day

- (A) Diesel Trackmobile
- (B) Plate Blend Silo

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

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

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

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

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

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

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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

B.6 Severability [326 IAC 2-8-4(4)]

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, 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;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP 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 Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

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

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

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

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

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) 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, OAM, on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM upon receiving a timely and complete 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.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM 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 in writing by IDEM, OAM, any additional information identified as needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11 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
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.20 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.21 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

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

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

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

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

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.22 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.24 Transfer of Ownership or Operation [326 IAC 2-1-6][326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) IDEM, OAM shall reserve the right to issue a new permit.

B.25 Annual Fee Payment [326 IAC 2-8-4(6)][326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.26 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and such facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Overall Source Limit [326 IAC 2-8]

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

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

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

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units identified as preblending operations (PB₁, PB₂, PB₃) and automatic feeder system (AFS) vented to the control equipments identified as baghouses (PS010, PS009) are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (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
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) **Indiana Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM,OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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 no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notify:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.10 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

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

C.11 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4][326 IAC 2-8-5] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

- (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency.

IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.14 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual emission statement 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, OAM, on or before the date it is due.

C.15 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

- (a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;

- (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (1) Three (3) preblending operations identified as PB1 through PB3, each with a maximum capacity of 165 pounds of additives and pigments per hour, particulate matter (PM) controlled by a baghouse identified as PS010, exhausting at a stack identified as B;
- (2) One (1) automated feeder system (AFS) receives raw material as additive, pigments, polypropylene resin, rubber, fillers at a maximum rate of 80, 80, 10450, 3215 and 2250 pounds per hour, particulate matter controlled by a baghouse identified as PS009, exhausting at a stack identified as A;
- (3) One (1) extruder identified as EX1B contains different heat zones for polymerization of raw materials, maximum capacity of 330 pounds per hour, exhausting at a stack identified as E;
- (4) One (1) extruder identified as EX2 contains different heat zones for polymerization of raw materials, maximum capacity of 1500 pounds per hour, exhausting at a stack identified as E;
- (5) One (1) extruder identified as EX3 contains different heat zones for polymerization of raw materials, maximum capacity of 1500 pounds per hour, exhausting at a stack identified as E;
- (6) One (1) extruder identified as EX5 contains different heat zones for polymerization of raw materials, maximum capacity of 3300 pounds per hour, exhausting at a stack identified as E;
- (7) One (1) extruder identified as EX6 contains different heat zones for polymerization of raw materials, maximum capacity of 6000 pounds per hour, exhausting at a stack identified as E;
- (8) One (1) pelletizing process identified as P1 with a maximum capacity of 330 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents;
- (9) One (1) pelletizing process identified as P2 with a maximum capacity of 1500 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents;
- (10) One (1) pelletizing process identified as P3 with a maximum capacity of 1500 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents;
- (11) One (1) pelletizing process identified as P5 with a maximum capacity of 3300 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents, exhausting to a stack identified as F;
- (12) One (1) pelletizing process identified as P6 with a maximum capacity of 6000 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents, exhausting to a stack identified as F;
- (13) One (1) extruder identified as EX4 contains different heat zones for polymerization of raw materials, maximum capacity of 3500 pounds per hour, exhausting at a stack identified as E;
- (14) One (1) pelletizing process identified as P4 with a maximum capacity of 3500 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents;

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

D.1.1 Part 70 Program [326 IAC 2-7] and Process Operation [326 IAC 6-3]

Pursuant to 326 IAC 2-7 (Part 70 Program) and 326 IAC 6-3 (Process Operation), the following facilities shall have an allowable PM emission limits:

- (a) Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour, the following equation is used:

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

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

Process / Facility	Process Weight Rate (tons/hour)	Truncated PM Allowable Emissions (lbs./hr)	PM ₁₀ Allowable Emissions (lbs./hr)
Preblending Operation (PB1)	0.0825	0.37	0.37
Preblending Operation (PB2)	0.0825	0.37	0.37
Preblending Operation (PB3)	0.0825	0.37	0.37
Automatic Feeder System (AFS)	8.03	7.95	7.95
Pelletizing Operation (P1)	0.165	0.59	0.59
Pelletizing Operation (P2)	0.75	1.62	1.62
Pelletizing Operation (P3)	0.75	1.62	1.62
Pelletizing Operation (P4)	1.75	2.86	2.86
Pelletizing Operation (P5)	1.65	2.75	2.75
Pelletizing Operation (P)	3.0	4.10	4.10

The above PM emission limits shall also equivalent to PM₁₀ emission limits. Compliance with this condition will make 326 IAC 2-7 (Part 70 Program) requirements not applicable.

Compliance Determination Requirements

D.1.2 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

During the period between 12 and 18 months after issuance of this permit, the Permittee shall perform PM-10 testing of an automatic feeder system (AFS) utilizing Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Compliance with the PM₁₀ limit shall be determined by a performance test conducted in accordance with Section C - Performance Testing. PM-10 includes filterable and condensable PM-10. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the automatic feeder system (AFS) is in compliance.

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

D.1.3 Particulate Matter (PM)

The baghouses identified as PS009 and PS010 for PM control shall be in operation at all times when the preblending operation (PB1, PB2, PB3) and automatic feeder system (AFS) are in operation and exhausting to the outside atmosphere.

D.1.4 Visible Emissions Notations

- (a) Daily visible emission notations of the preblending & automatic feeder system operation's stack exhausts identified as B & A shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.5 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags or cartridges controlling the preblending operation (PB1, PB2, PB3) and automatic feeder system (AFS) when venting to the atmosphere. The cartridge filter units (PS009 & PS010) inspection shall be performed as per manufacturer specifications. Inspections are optional when venting indoors. All defective bags or cartridges shall be replaced.

D.1.6 Broken Bag or Failure Detection

In the event that bag or cartridge failure has been observed:

- (a) The affected failed cartridge units and the associated facilities will be shut down immediately until the failed cartridge filter units have been repaired or replaced.
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated, For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of daily visible emission notations of the preblending & automatic feeder system operation's stack exhausts identified as B & A.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of the results of the inspections required under Condition D.1.5 (Baghouse Inspection).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (13) One (1) extruder identified as EX4 contains different heat zones for polymerization of raw materials, maximum capacity of 3500 pounds per hour, exhausting at a stack identified as E;
- (14) One (1) pelletizing process identified as P4 with a maximum capacity of 3500 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents;

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.2]

General Construction Conditions

D.2.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.2.3 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.

D.2.4 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

D.2.5 This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to:

Indiana Department of Environmental Management
Permit Administration & Development Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

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

Source Name: Chemtrusion Indiana, Inc.
Source Address: 1403 Port Road, Jeffersonville, Indiana 47130
Mailing Address: 1403 Port Road, Jeffersonville, Indiana 47130
FESOP No.: F019-9668-00091

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

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

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

Source Name: Chemtrusion Indiana, Inc.
Source Address: 1403 Port Road, Jeffersonville, Indiana 47130
Mailing Address: 1403 Port Road, Jeffersonville, Indiana 47130
FESOP No.: F 019- 9668- 00091

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) CThe Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) CThe Permittee must submit notice in writing within ten (10) calendar days

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

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

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

Page 2 of 2

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

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Chemtrusion Indiana, Inc.
 Source Address: 1403 Port Road, Jeffersonville, Indiana 47130
 Mailing Address: 1403 Port Road, Jeffersonville, Indiana 47130
 FESOP No.: F 019-9668-00091

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement	Number of Deviations	Date of each Deviation
D.1.4 [Visible Emissions Notations]		
D.1.5 [Baghouse Inspections]		
D.1.6 [Broken Bag or Failure Detection]		

Form Completed By: _____
 Title/Position: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name: Chemtrusion Indiana, Inc.
Source Location: 1403 Port Road, Jeffersonville, Indiana 47130
County: Clark
SIC Code: 3087
Operation Permit No.: F019-9668-00091
Permit Reviewer: Manoj P. Patel

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Chemtrusion Indiana, Inc. relating to the operation of a polypropylene plastic production by extrusion.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

The source consists of the following unpermitted facilities/units:

- (1) Three (3) preblending operations identified as PB₁ through PB₃, each with a maximum capacity of 165 pounds of additives and pigments per hour, particulate matter (PM) controlled a baghouse identified as PS010, exhausting at a stack identified as B;
- (2) One (1) automated feeder system receives raw material as additive, pigments, polypropylene resin, rubber, fillers at a maximum rate of 80, 80, 10450, 3215 and 2250 pounds per hour, particulate matter controlled by a baghouse identified as PS009, exhausting at a stack identified as A;
- (3) One (1) extruder identified as EX₁ contains different heat zones for polymerization of raw materials, maximum capacity of 330 pounds per hour, exhausting at a stack identified as E;
- (4) One (1) extruder identified as EX₂ contains different heat zones for polymerization of raw materials, maximum capacity of 1500 pounds per hour, exhausting at a stack identified as E;
- (5) One (1) extruder identified as EX₃ contains different heat zones for polymerization of raw materials, maximum capacity of 1500 pounds per hour, exhausting at a stack identified as E;
- (6) One (1) extruder identified as EX₅ contains different heat zones for polymerization of raw materials, maximum capacity of 3300 pounds per hour, exhausting at a stack identified as E;
- (7) One (1) extruder identified as EX₆ contains different heat zones for polymerization of raw materials, maximum capacity of 6000 pounds per hour, exhausting at a stack identified as E;

- (8) One (1) pelletizing process identified as P₁ with a maximum capacity of 330 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents, exhausting to a stack identified as D;
- (9) One (1) pelletizing process identified as P₂ with a maximum capacity of 1500 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents, exhausting to a stack identified as D;
- (10) One (1) pelletizing process identified as P₃ with a maximum capacity of 1500 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents, exhausting to a stack identified as D;
- (11) One (1) pelletizing process identified as P₅ with a maximum capacity of 3300 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents, exhausting to a stack identified as D;
- (12) One (1) pelletizing process identified as P₆ with a maximum capacity of 6000 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents, exhausting to a stack identified as D;

New Emission Units and Pollution Control Equipment Requiring ENSR

The application includes information relating to the construction and operation of the following equipment:

- (1) One (1) extruder identified as EX₄ contains different heat zones for polymerization of raw materials, maximum capacity of 3500 pounds per hour, exhausting at a stack identified as E;
- (2) One (1) pelletizing process identified as P₄ with a maximum capacity of 3500 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents, exhausting to a stack identified as D;

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Space heaters, process heaters, or boilers using the following fuels.
 - (A) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
 - (i) Three (3) natural gas fired process heaters identified as OF₁ to OF₃, each rated at 1.20 million British thermal units (mmBtu/hr).
- (2) Cleaners and solvents characterized as follow:
 - (A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.30 psi measured at 38 degrees C (100° F) or;
 - (B) having a vapor pressure equal to or less than 0.70 kPa; 5 mm Hg; or 0.10 psi measured at 20° C (68° F);

- The use of which for all cleaners and solvents combined does not exceed 145 gallons per months.
- (3) Natural draft cooling towers not regulated under a NESHAP.
 - (A) Forced and induced draft cooling tower system not regulated under a NESHAP.
 - (4) Replacement or repair of electrostatic precipitator, bags in the baghouses and filters in other air filtration equipment.
 - (5) Conveyors as follows:
 - (A) Enclosed systems for conveying plastic raw materials and plastic finished goods.
 - (6) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
 - (7) Other activities or categories not previously identified:

Insignificant Thresholds:

Lead (Pb) = 0.60 tons/year or 3.29 lbs/hour
Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxide (SO₂) = 5 lbs/hour or 25 lbs/day
Particulate Matter (PM) = 5 lbs/hour or 25 pounds/day
Volatile Organic Compounds (VOC) = 3 lbs/hour or 15 lbs/day

- (A) Diesel Trackmobile
- (B) Plate Blend Silo

Existing Approvals

The are no existing approvals issued to the source.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit 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 administratively incomplete FESOP permit application for the purposes of this review was received on April 8, 1998. Additional information received on August 19, 1998 makes the

FESOP permit application administratively completes.

Emission Calculations

- (a) See Appendix A for natural gas fired heaters (OF₁ to OF₃).
- (b) See Appendix B for Preblending Operation, Extruders, Automatic feeder System and Pelletizing Operations.

Total Potential and Allowable Emissions

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	206.35	707.80
Particulate Matter (PM10)	206.35	707.80
Sulfur Dioxide (SO ₂)	0.01	0.01
Volatile Organic Compounds (VOC)	35.30	35.30
Carbon Monoxide (CO)	1.30	1.30
Nitrogen Oxides (NO _x)	1.60	1.60
Single Hazardous Air Pollutant (HAP)	0.20	0.20
Combination of HAPs	0.25	0.25

- (a) Allowable emissions are determined from the applicability of rule 326 IAC 6-3.

Preblending operation (PB₁): (P = 0.0825 ton/hr)

$$\begin{aligned}
 E &= 4.10 P^{0.67} \\
 &= 4.10 (0.0825)^{0.67} \\
 &= 0.77 \text{ lb./hr} \\
 &= 3.38 \text{ tons/year}
 \end{aligned}$$

Preblending operation (PB₂): (P = 0.0825 ton/hr)

$$\begin{aligned}
 E &= 4.10 P^{0.67} \\
 &= 4.10 (0.0825)^{0.67} \\
 &= 0.77 \text{ lb./hr} \\
 &= 3.38 \text{ tons/year}
 \end{aligned}$$

Preblending operation (PB₃): (P = 0.0825 ton/hr)

$$\begin{aligned}
 E &= 4.10 P^{0.67} \\
 &= 4.10 (0.0825)^{0.67} \\
 &= 0.77 \text{ lb./hr} \\
 &= 3.38 \text{ tons/year}
 \end{aligned}$$

Automatic Feeder System (AFS): (P = 8.03 ton/hr)

$$\begin{aligned} E &= 4.10 P^{0.67} \\ &= 4.10 (8.03)^{0.67} \\ &= 16.56 \text{ lb./hr} \\ &= 72.51 \text{ tons/year} \end{aligned}$$

Pelletizing Operation (P₁): (P = 0.165 ton/hr)

$$\begin{aligned} E &= 4.10 P^{0.67} \\ &= 4.10 (0.165)^{0.67} \\ &= 1.22 \text{ lbs./hr} \\ &= 5.35 \text{ tons/year} \end{aligned}$$

Pelletizing Operation (P₂): (P = 0.75 ton/hr)

$$\begin{aligned} E &= 4.10 P^{0.67} \\ &= 4.10 (0.75)^{0.67} \\ &= 3.38 \text{ lbs./hr} \\ &= 14.80 \text{ tons/year} \end{aligned}$$

Pelletizing Operation (P₃): (P = 0.75 ton/hr)

$$\begin{aligned} E &= 4.10 P^{0.67} \\ &= 4.10 (0.75)^{0.67} \\ &= 3.38 \text{ lbs./hr} \\ &= 14.80 \text{ tons/year} \end{aligned}$$

Pelletizing Operation (P₄): (P = 1.75 tons/hr)

$$\begin{aligned} E &= 4.10 P^{0.67} \\ &= 4.10 (1.75)^{0.67} \\ &= 5.96 \text{ lbs./hr} \\ &= 26.10 \text{ tons/year} \end{aligned}$$

Pelletizing Operation (P₅): (P = 1.65 tons/hr)

$$\begin{aligned} E &= 4.10 P^{0.67} \\ &= 4.10 (1.65)^{0.67} \\ &= 5.73 \text{ lbs./hr} \\ &= 25.10 \text{ tons/year} \end{aligned}$$

Pelletizing Operations (P₆): (P = 3.0 tons/hr)

$$\begin{aligned} E &= 4.10 P^{0.67} \\ &= 4.10 (3.0)^{0.67} \\ &= 8.55 \text{ lbs./hr} \\ &= 37.50 \text{ tons/year} \end{aligned}$$

- (b) The allowable emissions based on the rules cited are less than the potential emissions, therefore, the allowable emissions are used for the permitting determination.

- (c) Allowable emissions (as defined in the Indiana Rule) of particulate matter (PM) and VOC are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM	707.80
PM-10	707.80
SO ₂	0.01
VOC	35.20
CO	1.30
NO _x	1.60

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Lead Compounds	0.20
Chromium Compounds	0.05
TOTAL	0.25

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of particulate matter less than 10 microns are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit

Source’s potential-to-emit (PTE) of PM₁₀ of less than 100 tons per year, will be accomplished by the enforceable controls.

County Attainment Status

The source is located in Clark County.

Pollutant	Status
TSP	attainment or unclassifiable
PM-10	attainment or unclassifiable
SO ₂	attainment or unclassifiable
NO ₂	attainment or unclassifiable
Ozone	moderate non-attainment
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Clark County has been designated as moderate nonattainment for ozone.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	8.20
PM10	8.20
SO ₂	0.03
VOC	35.20
CO	1.30
NO _x	1.60
Single HAP	0.20
Combination HAPs	0.25

- (a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater, no nonattainment pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2 and 2-3, and 40 CFR 52.21, the PSD and Emission Offset requirements do not apply.

Federal Rule Applicability

- (a) 40 CFR Part 60, Subpart DDD, Standards of Performance for Volatile Organic Compounds (VOC) emissions from the Polymer Manufacturing Industry
This polypropylene extrusion process is not covered by 40 CFR Part 60, Subpart DDD, Standards of Performance for Volatile Organic Compounds (VOC) emissions from the Polymer Manufacturing Industry, because this source does not manufacture polypropylene resins.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year in Clark County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3 (Process Operations)

(1) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from,

- (a) preblending operation identified as PB₁ shall not exceed 0.77 pound per hour when operating at a process weight rate of 0.0825 tons per hour;
- (b) preblending operation identified as PB₂ shall not exceed 0.77 pound per hour when operating at a process weight rate of 0.0825 tons per hour;
- (c) preblending operation identified as PB₃ shall not exceed 0.77 pound per hour when operating at a process weight rate of 0.0825 tons per hour;
- (d) automatic feeder system identified as AFS shall not exceed 16.56 pounds per hour when operating at a process weight rate of 8.03 tons per hour;
- (e) pelletizing operation identified as P₁ shall not exceed 1.22 pounds per hour when operating at a process weight rate of 0.165 ton per hour;
- (f) pelletizing operation identified as P₂ shall not exceed 3.38 pounds per hour when operating at a process weight rate of 0.75 ton per hour;
- (g) pelletizing operation identified as P₃ shall not exceed 3.38 pounds per hour when operating at a process weight rate of 0.75 ton per hour;
- (h) pelletizing operation identified as P₄ shall not exceed 5.96 pounds per hour when operating at a process weight rate of 1.75 tons per hour;
- (i) pelletizing operation identified as P₅ shall not exceed 5.73 pounds per hour when operating at a process weight rate of 1.65 tons per hour;
- (j) pelletizing operation identified as P₆ shall not exceed 8.55 pounds per hour when operating at a process weight rate of 3.0 tons per hour;

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

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

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

(2) Preblending operation (PB₁): (P = 0.0825 ton/hr)

$$\begin{aligned} E &= 4.10 P^{0.67} \\ &= 4.10 (0.0825)^{0.67} \\ &= 0.77 \text{ lb./hr} \\ &= 3.38 \text{ tons/year} \end{aligned}$$

Preblending operation (PB₂): (P = 0.0825 ton/hr)

$$\begin{aligned} E &= 4.10 P^{0.67} \\ &= 4.10 (0.0825)^{0.67} \\ &= 0.77 \text{ lb./hr} \\ &= 3.38 \text{ tons/year} \end{aligned}$$

Preblending operation (PB₃): (P = 0.0825 ton/hr)

$$\begin{aligned} E &= 4.10 P^{0.67} \\ &= 4.10 (0.0825)^{0.67} \\ &= 0.77 \text{ lb./hr} \\ &= 3.38 \text{ tons/year} \end{aligned}$$

Potential PM emissions are less than the allowable emissions. So, preblending operations (PB₁, PB₂, PB₃) comply with 326 IAC 6-3-2.

(3) Automatic Feeder System (AFS): (P = 8.03 ton/hr)

$$\begin{aligned} E &= 4.10 P^{0.67} \\ &= 4.10 (8.03)^{0.67} \\ &= 16.55 \text{ lb./hr} \\ &= 72.50 \text{ tons/year} \end{aligned}$$

Controlled particulate matter (PM) emissions are less than the allowable emissions. So, automatic feeder system complies with 326 IAC 6-3-2.

(4) Pelletizing Operation (P₁): (P = 0.165 ton/hr)

$$\begin{aligned} E &= 4.10 P^{0.67} \\ &= 4.10 (0.165)^{0.67} \\ &= 1.22 \text{ lbs./hr} \\ &= 5.35 \text{ tons/year} \end{aligned}$$

Pelletizing Operation (P₂): (P = 0.75 ton/hr)

$$\begin{aligned} E &= 4.10 P^{0.67} \\ &= 4.10 (0.75)^{0.67} \\ &= 3.38 \text{ lbs./hr} \\ &= 14.80 \text{ tons/year} \end{aligned}$$

Pelletizing Operation (P₃): (P = 0.75 ton/hr)

$$\begin{aligned} E &= 4.10 P^{0.67} \\ &= 4.10 (0.75)^{0.67} \\ &= 3.38 \text{ lbs./hr} \\ &= 14.80 \text{ tons/year} \end{aligned}$$

Pelletizing Operation (P₄): (P = 1.75 tons/hr)

$$\begin{aligned}
 E &= 4.10 P^{0.67} \\
 &= 4.10 (1.75)^{0.67} \\
 &= 5.96 \text{ lbs./hr} \\
 &= 26.10 \text{ tons/year}
 \end{aligned}$$

Pelletizing Operation (P₅): (P = 1.65 tons/hr)

$$\begin{aligned}
 E &= 4.10 P^{0.67} \\
 &= 4.10 (1.65)^{0.67} \\
 &= 5.73 \text{ lbs./hr} \\
 &= 25.10 \text{ tons/year}
 \end{aligned}$$

Pelletizing Operations (P₆): (P = 3.0 tons/hr)

$$\begin{aligned}
 E &= 4.10 P^{0.67} \\
 &= 4.10 (3.0)^{0.67} \\
 &= 8.55 \text{ lbs./hr} \\
 &= 37.50 \text{ tons/year}
 \end{aligned}$$

Potential PM emissions are less than the allowable emissions. So, pelletizing operation (P₁ through P₆) comply with 326 IAC 6-3-2.

Since PM and PM₁₀ emissions are the same, an allowable emission rate of 206 tons per year for particulate matter, this would be subject to the 326 IAC 2-7 rules for exceeding the Title V threshold levels for PM₁₀ (100 tons/year). Allowable particulate matter emissions are truncated as follows:

$$(99.0 \text{ tons year of PM or PM}_{10}) = 22.60 \text{ lbs. PM/hour}$$

Process / Facility	Process Weight Rate (tons/hour)	PM Allowable Emissions (lbs./hr)	Truncated PM Allowable Emissions (lbs./hr)	Controlled PM Emissions (lbs./hr)	Comply with 326 IAC 6-3-2(c)
Preblending Operation (PB ₁)	0.0825	0.77	0.37	0.25	YES
Preblending Operation (PB ₂)	0.0825	0.77	0.37	0.25	YES
Preblending Operation (PB ₃)	0.0825	0.77	0.37	0.25	YES
Automatic Feeder System (AFS)	8.03	16.56	7.95	1.60	YES
Pelletizing Operation (P ₁)	0.165	1.22	0.59	0.0052	YES
Pelletizing Operation (P ₂)	0.75	3.38	1.62	0.024	YES
Pelletizing Operation (P ₃)	0.75	3.38	1.62	0.024	YES
Pelletizing Operation (P ₄)	1.75	5.96	2.86	0.056	YES

Pelletizing Operation (P ₅)	1.65	5.73	2.75	0.052	YES
Pelletizing Operation (P ₆)	3.0	8.55	4.10	0.096	YES

$$\text{Truncated PM allowable Emissions} = \frac{\text{facility's PM allowable PM, lbs./hr} * \text{truncated PM allowable, lbs./hr}}{\text{Total facilities PM allowable, lb./hour}}$$

At a particulate matter allowable emission rate of 22.60 lbs PM/hour, PM and PM₁₀ emissions will be less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

326 IAC 8-1-6 General Provisions Relating to VOC Rules: General Reduction Requirements for New Facilities. The extruders identified as EX₁ through EX₆ is not subject 326 IAC 8-1-6 (General Provisions Relating to VOC Rules: General Reduction Requirements for New Facilities) because the potential VOC emissions from each facility are less than 25 tons per year.

No other article 8 rules apply to this source.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The preblending operations (PB₁ through PB₃), automated feeder system (AFS) has applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the preblending & automated feeder system operation's stack exhausts identified as B & A shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for

this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

- (b) An inspection shall be performed each calendar quarter of all bags controlling the preblending and automatic feeder system operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (c) In the event that bag failure has been observed:
 - (A) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.
 - (B) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

These monitoring conditions are necessary because the baghouses (PS010 & PS009) for the preblending and automated feeder system operations must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See Appendix C of this TSD for detailed air toxic calculations.

Conclusion

The operation of this polypropylene plastic production by extrusion operation shall be subject to the conditions of the attached proposed **FESOP Permit No. F019-9668-00091**.

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

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)
and Enhanced New Source Review (ENSR)

**Chemtrusion Indiana, Inc.
1403 Port Road, Jeffersonville, Indiana 47130**

F-019-9668, Pit ID-019-00091

On September 17, 1998, the Office of Air Management (OAM) had a notice published in the Clark County Evening News, Jeffersonville, Indiana, stating that Chemtrusion Indiana, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) and Enhanced New Source Review (ENSR) to operate a plastic extrusion facilities with a cartridge filters units for PM control. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 6, 1998, Ms. Evely Crooks of Environmental Compliance Source, Ltd., on behalf of Chemtrusion Indiana, Inc. submitted comments on the proposed FESOP and ENSR. The summary of the comments is as follows:

Comment 1:

Section A.2 (Emissions Units and Pollution Control Equipment Summary), on page 4 of 36, of the proposed permit, should be changed to full font arabic symbols for all emission units. A subsection (3) of section A.2, unit should be noted as EX1B. Subsections (8), (9), (10) and (14) do not exhaust to any vent. Palletizer units P5 and P6 in subsections (11) and (12) of section A.2 exhaust to stack F. Please change all related sections.

Response 1:

The information describing the source is descriptive information and does not constitute any enforceable conditions. However, the following changes have been made to section A.2 and D.1, on pages 4 and 26 of 35 the final permit as follows (changes are bolded for emphasis):

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

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

- (1) Three (3) preblending operations identified as PB₁ through PB₃, each with a maximum capacity of 165 pounds of additives and pigments per hour, particulate matter (PM) controlled a baghouse identified as PS010, exhausting at a stack identified as B;

- (2) One (1) automated feeder system (**AFS**) receives raw material as additive, pigments, polypropylene resin, rubber, fillers at a maximum rate of 80, 80, 10450, 3215 and 2250 pounds per hour, particulate matter controlled by a baghouse identified as PS009, exhausting at a stack identified as A;
- (3) One (1) extruder identified as EX₄**1B** contains different heat zones for polymerization of raw materials, maximum capacity of 330 pounds per hour, exhausting at a stack identified as E;
- (4) One (1) extruder identified as EX₂**2** contains different heat zones for polymerization of raw materials, maximum capacity of 1500 pounds per hour, exhausting at a stack identified as E;
- (5) One (1) extruder identified as EX₂**3** contains different heat zones for polymerization of raw materials, maximum capacity of 1500 pounds per hour, exhausting at a stack identified as E;
- (6) One (1) extruder identified as EX₅**5** contains different heat zones for polymerization of raw materials, maximum capacity of 3300 pounds per hour, exhausting at a stack identified as E;
- (7) One (1) extruder identified as EX₆**6** contains different heat zones for polymerization of raw materials, maximum capacity of 6000 pounds per hour, exhausting at a stack identified as E;
- (8) One (1) pelletizing process identified as P₄**1** with a maximum capacity of 330 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents ~~exhausting to a stack identified as D;~~
- (9) One (1) pelletizing process identified as P₂**2** with a maximum capacity of 1500 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents ~~exhausting to a stack identified as D;~~
- (10) One (1) pelletizing process identified as P₃**3** with a maximum capacity of 1500 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents, ~~exhausting to a stack identified as D;~~
- (11) One (1) pelletizing process identified as P₅**5** with a maximum capacity of 3300 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents, exhausting to a stack identified as ~~D~~ **F**;
- (12) One (1) pelletizing process identified as P₆**6** with a maximum capacity of 6000 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents, exhausting to a stack identified as ~~D~~ **F**;
- (13) One (1) extruder identified as EX₄**4** contains different heat zones for polymerization of raw materials, maximum capacity of 3500 pounds per hour, exhausting at a stack identified as E;

- (14) One (1) pelletizing process identified as P₄ 4 with a maximum capacity of 3500 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents, ~~exhausting to a stack identified as D;~~

D.1.1 Part 70 Program [326 IAC 2-7] and Process Operation [326 IAC 6-3]

Pursuant to 326 IAC 2-7 (Part 70 Program) and 326 IAC 6-3 (Process Operation), the following facilities shall have an allowable PM emission limits:

- (a) Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour, the following equation is used:

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

Process / Facility	Process Weight Rate (tons/hour)	Truncated PM Allowable Emissions (lbs./hr)
Preblending Operation (PB ₁ 1)	0.0825	0.37
Preblending Operation (PB ₂ 2)	0.0825	0.37
Preblending Operation (PB ₃ 3)	0.0825	0.37
Automatic Feeder System (AFS)	8.03	7.95
Pelletizing Operation (P ₁ 1)	0.165	0.59
Pelletizing Operation (P ₂ 2)	0.75	1.62
Pelletizing Operation (P ₃ 3)	0.75	1.62
Pelletizing Operation (P ₄ 4)	1.75	2.86
Pelletizing Operation (P ₅ 5)	1.65	2.75
Pelletizing Operation (P ₆ 6)	3.0	4.10

The above PM emission limits shall also equivalent to PM₁₀ emission limits. Compliance with this condition will make 326 IAC 2-7 (Part 70 Program) requirements not applicable.

D.1.3 Particulate Matter (PM)

The baghouses identified as PS009 and PS010 for PM control shall be in operation at all times when the preblending operation (~~PB₁, PB₂, PB₃~~ **PB1, PB2, PB3**) and automatic feeder system (AFS) are in operation and exhausting to the outside atmosphere.

D.1.5 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the preblending operation (~~PB₁, PB₂, PB₃~~ **PB1, PB2, PB3**) and automatic feeder system (AFS) when venting to the atmosphere. The baghouses (PS009 & PS010) inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter.

Inspections are optional when venting indoors. All defective bags shall be replaced.

Comment 2:

The building at the Source was constructed in 1996. There is no asbestos in the structure and none will be added. Chemtrusion objects to the inclusion of this non-applicable condition C.7 (Asbestos Abatement Projects) on page 19 of 36 in this permit.

Response 2:

Renovation is defined in 326 IAC 14-10-2 (38) as altering a facility or a component of a facility in any way. All areas where renovation or demolition are going to occur must be inspected by an accredited asbestos inspector. The language in the permit is the same as the Federal language found in 40 CFR 61, Subpart M. Not every renovation must be reported. If the Permittee's renovation will involve stripping, removing or disturbing two hundred sixty (260) linear feet on pipes, one hundred sixty (160) square feet on other facility components; or a total of thirty-five feet (35) cubic feet on all facility components or more of friable asbestos, then the Permittee must notify IDEM using an IDEM notification form at least ten (10) working prior to renovation.

Demolition is defined as removing supporting beams, walls or structures of a facility. 326 IAC 14-10-1(a)(1) states that the Permittee must properly notify IDEM of every demolition project, even if no asbestos is present. There have been no changes resulting from this comment.

Comment 3:

Chemtrusion requires clarification regarding timing in condition C.17 (General Reporting Requirements), the semi-annual report found on page 36 of 36 of the permit. Is the report due on a permit year cycle or a calendar year cycle?

Response 3:

The semiannual report will be due on the basis of a permit year cycle.

Comment 4:

Chemtrusion objects condition C.18 (Compliance with 40 CFR 82 and 326 IAC 22-1), on page 26 of 36 in the draft permit. This condition makes the source liable for any mistakes made by a contract HVAC firm working on ancillary building equipment. The source does not believe IDEM has the authority to impose such a condition.

Response 4:

40 CFR 82 regulates the handling of ozone-depleting substances such as Freon in a variety of processes and products including domestic and commercial refrigeration and air-conditioning units and portable fire extinguishers. Most sources include one or more subject units. Maintenance or repair of such units has the potential to release substances controlled under these rules. The condition C.18 (Compliance with 40 CFR 82 and 326 IAC 22-1), on page 26 of 35 of the final permit remains unchanged.

Comment 5:

Condition D.1.2 (Testing Requirements), on page 28 of 36 of the draft permit should be deleted. Chemtrusion does not accept this condition. It is our position that this test is totally unnecessary in view of the daily and periodic inspections of the dust control equipment which are more than sufficient to verify effective operation. This device can be configured to trigger an alarm in the event of a malfunction.

Response 5:

The potential particulate matter (PM) emissions from automatic feeder system (AFS) have been calculated by using an emission factor of 20 pounds of PM /tons of powder or granular raw materials into the system. The potential PM (or PM₁₀) emissions from facility are 703.40 tons per year, contributing more than 99 percent of PM emissions from the source. Pursuant to 326 IAC 6-3-2(c) (Process Operations: PM Emissions), the allowable PM emissions from the automatic feeder system (AFS) are 7.95 pounds per hour. Testing the PM (or PM₁₀) emissions from the automatic feeder system (AFS) will provide more accurate emission factors for the operations. Thus, testing gives a basis for demonstrating compliance with 326 IAC 6-3-2. The condition D.1.2 (Testing Requirements), on page 28 of 35 of the final permit will remain unchanged.

Comment 6:

Condition D.1.5 (Baghouse Inspections), on page 29 of 36 of the draft permit, should be change from a baghouse to a cartridge filter unit. Chemtrusion requests to perform inspection according to the manufacture's recommendations.

Response 6:

Condition D.1.6 (Baghouse Inspections), on page 29 of 35 of the final permit has been changed as follows (changes are bolded for emphasis):

D.1.5 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags **or cartridges** controlling the preblending operation (~~PB₁, PB₂, PB₃~~ **PB1, PB2, PB3**) and automatic feeder system (AFS) when venting to the atmosphere. The ~~baghouses~~ **cartridge filter unit** (PS009 & PS010) inspection shall be performed ~~within three months of redirecting vents to the atmosphere and every three months thereafter~~ **as per manufacturer specifications**. Inspections are optional when venting indoors. All defective bags **or cartridges** shall be replaced.

Comment 7:

Condition D.1.6 (Broken Bag or Failure Detection), on page 30 of 36 of the draft permit, should be modified because there is no compartment to shutdown and control units are cartridge filters.

Response 7:

OAM has reviewed the manufacturer information for the cartridge units. Condition D.1.6 (Broken Bag or Failure Detection), on page 29 of 35 of the final permit, has been changed as follows:

D.1.6 Broken Bag or Failure Detection

In the event that bag **or cartridge** failure has been observed:

- (a) The affected ~~compartments~~ **failed cartridge filter units and associated facilities** will be shut down immediately until the failed **cartridge filter** units have been repaired or replaced. ~~For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.~~
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated, For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

On the further review of the draft permit, OAM has made the following changes to conditions D.1.1 and D.1.2, on page 27 and 28 of 35 of the final permit as follows:

D.1.1 Part 70 Program [326 IAC 2-7] and Process Operation [326 IAC 6-3]

Pursuant to 326 IAC 2-7 (Part 70 Program) and 326 IAC 6-3 (Process Operation), the following facilities shall have an allowable PM emission limits:

- (a) Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour, the following equation is used:

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

Process / Facility	Process Weight Rate (tons/hour)	Truncated PM Allowable Emissions (lbs./hr)	PM₁₀ Allowable Emissions (lbs./hr)
Preblending Operation (PB1)	0.0825	0.37	0.37
Preblending Operation (PB2)	0.0825	0.37	0.37
Preblending Operation (PB3)	0.0825	0.37	0.37
Automatic Feeder System (AFS)	8.03	7.95	7.95
Pelletizing Operation (P1)	0.165	0.59	0.59
Pelletizing Operation (P2)	0.75	1.62	1.62
Pelletizing Operation (P3)	0.75	1.62	1.62
Pelletizing Operation (P4)	1.75	2.86	2.86
Pelletizing Operation (P5)	1.65	2.75	2.75
Pelletizing Operation (P)	3.0	4.10	4.10

The above PM emission limits shall also equivalent to PM₁₀ emission limits. Compliance with this condition will make 326 IAC 2-7 (Part 70 Program) requirements not applicable.

D.1.2 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

During the period between 12 and 18 months after issuance of this permit, the Permittee shall perform PM-10 testing of an automatic feeder system (AFS) utilizing Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner.

This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. ~~PM-10 includes filterable and condensable PM-10.~~ Compliance with the PM₁₀ limit shall be determined by a performance test conducted in accordance with Section C - Performance Testing. PM-10 includes filterable and condensable PM-10. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the automatic feeder system (AFS) is in compliance. ~~PM₁₀ limit shall be as follows:~~

Process: Automatic Feeder System (AFS)	PM ₁₀ Limit
Baghouse (PS-009)	7.95 pounds per hour

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

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)
and Enhanced New Source Review (ENSR)

**Chemtrusion Indiana, Inc.
1403 Port Road, Jeffersonville, Indiana 47130**

F-019-9668, Pit ID-019-00091

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On October 6, 1998, Ms. Evely Crooks of Environmental Compliance Source, Ltd., on behalf of Chemtrusion Indiana, Inc. submitted comments on the proposed FESOP and ENSR. The summary of the comments is as follows:

Comment 1:

Section A.2 (Emissions Units and Pollution Control Equipment Summary), on page 4 of 36, of the proposed permit, should be changed to full font arabic symbols for all emission units. A subsection (3) of section A.2, unit should be noted as EX1B. Subsections (8), (9), (10) and (14) do not exhaust to any vent. Palletizer units P5 and P6 in subsections (11) and (12) of section A.2 exhaust to stack F. Please change all related sections.

Response 1:

The information describing the source is descriptive information and does not constitute any enforceable conditions. However, the following changes have been made to section A.2 and D.1, on pages 4 and 26 of 35 the final permit as follows (changes are bolded for emphasis):

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

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

- (1) Three (3) preblending operations identified as PB₁ through PB₃, each with a maximum capacity of 165 pounds of additives and pigments per hour, particulate matter (PM) controlled a baghouse identified as PS010, exhausting at a stack identified as B;

- (2) One (1) automated feeder system (**AFS**) receives raw material as additive, pigments, polypropylene resin, rubber, fillers at a maximum rate of 80, 80, 10450, 3215 and 2250 pounds per hour, particulate matter controlled by a baghouse identified as PS009, exhausting at a stack identified as A;
- (3) One (1) extruder identified as EX₄**1B** contains different heat zones for polymerization of raw materials, maximum capacity of 330 pounds per hour, exhausting at a stack identified as E;
- (4) One (1) extruder identified as EX₂**2** contains different heat zones for polymerization of raw materials, maximum capacity of 1500 pounds per hour, exhausting at a stack identified as E;
- (5) One (1) extruder identified as EX₂**3** contains different heat zones for polymerization of raw materials, maximum capacity of 1500 pounds per hour, exhausting at a stack identified as E;
- (6) One (1) extruder identified as EX₅**5** contains different heat zones for polymerization of raw materials, maximum capacity of 3300 pounds per hour, exhausting at a stack identified as E;
- (7) One (1) extruder identified as EX₆**6** contains different heat zones for polymerization of raw materials, maximum capacity of 6000 pounds per hour, exhausting at a stack identified as E;
- (8) One (1) pelletizing process identified as P₄**1** with a maximum capacity of 330 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents ~~exhausting to a stack identified as D;~~
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- (10) One (1) pelletizing process identified as P₃**3** with a maximum capacity of 1500 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents, ~~exhausting to a stack identified as D;~~
- (11) One (1) pelletizing process identified as P₅**5** with a maximum capacity of 3300 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents, exhausting to a stack identified as ~~D~~ **F**;
- (12) One (1) pelletizing process identified as P₆**6** with a maximum capacity of 6000 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents, exhausting to a stack identified as ~~D~~ **F**;
- (13) One (1) extruder identified as EX₄**4** contains different heat zones for polymerization of raw materials, maximum capacity of 3500 pounds per hour, exhausting at a stack identified as E;

- (14) One (1) pelletizing process identified as P₄ 4 with a maximum capacity of 3500 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents, ~~exhausting to a stack identified as D;~~

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The above PM emission limits shall also equivalent to PM₁₀ emission limits. Compliance with this condition will make 326 IAC 2-7 (Part 70 Program) requirements not applicable.

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D.1.5 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the preblending operation (~~PB₁, PB₂, PB₃~~ **PB1, PB2, PB3**) and automatic feeder system (AFS) when venting to the atmosphere. The baghouses (PS009 & PS010) inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter.

Inspections are optional when venting indoors. All defective bags shall be replaced.

Comment 2:

The building at the Source was constructed in 1996. There is no asbestos in the structure and none will be added. Chemtrusion objects to the inclusion of this non-applicable condition C.7 (Asbestos Abatement Projects) on page 19 of 36 in this permit.

Response 2:

Renovation is defined in 326 IAC 14-10-2 (38) as altering a facility or a component of a facility in any way. All areas where renovation or demolition are going to occur must be inspected by an accredited asbestos inspector. The language in the permit is the same as the Federal language found in 40 CFR 61, Subpart M. Not every renovation must be reported. If the Permittee's renovation will involve stripping, removing or disturbing two hundred sixty (260) linear feet on pipes, one hundred sixty (160) square feet on other facility components; or a total of thirty-five feet (35) cubic feet on all facility components or more of friable asbestos, then the Permittee must notify IDEM using an IDEM notification form at least ten (10) working prior to renovation.

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Comment 3:

Chemtrusion requires clarification regarding timing in condition C.17 (General Reporting Requirements), the semi-annual report found on page 36 of 36 of the permit. Is the report due on a permit year cycle or a calendar year cycle?

Response 3:

The semiannual report will be due on the basis of a permit year cycle.

Comment 4:

Chemtrusion objects condition C.18 (Compliance with 40 CFR 82 and 326 IAC 22-1), on page 26 of 36 in the draft permit. This condition makes the source liable for any mistakes made by a contract HVAC firm working on ancillary building equipment. The source does not believe IDEM has the authority to impose such a condition.

Response 4:

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Comment 5:

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Response 5:

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Comment 6:

Condition D.1.5 (Baghouse Inspections), on page 29 of 36 of the draft permit, should be change from a baghouse to a cartridge filter unit. Chemtrusion requests to perform inspection according to the manufacture's recommendations.

Response 6:

Condition D.1.6 (Baghouse Inspections), on page 29 of 35 of the final permit has been changed as follows (changes are bolded for emphasis):

D.1.5 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags **or cartridges** controlling the preblending operation (~~PB₁, PB₂, PB₃~~ **PB1, PB2, PB3**) and automatic feeder system (AFS) when venting to the atmosphere. The ~~baghouses~~ **cartridge filter unit** (PS009 & PS010) inspection shall be performed ~~within three months of redirecting vents to the atmosphere and every three months thereafter~~ **as per manufacturer specifications**. Inspections are optional when venting indoors. All defective bags **or cartridges** shall be replaced.

Comment 7:

Condition D.1.6 (Broken Bag or Failure Detection), on page 30 of 36 of the draft permit, should be modified because there is no compartment to shutdown and control units are cartridge filters.

Response 7:

OAM has reviewed the manufacturer information for the cartridge units. Condition D.1.6 (Broken Bag or Failure Detection), on page 29 of 35 of the final permit, has been changed as follows:

D.1.6 Broken Bag or Failure Detection

In the event that bag **or cartridge** failure has been observed:

- (a) The affected ~~compartments~~ **failed cartridge filter units and associated facilities** will be shut down immediately until the failed **cartridge filter** units have been repaired or replaced. ~~For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.~~
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated, For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

On the further review of the draft permit, OAM has made the following changes to conditions D.1.1 and D.1.2, on page 27 and 28 of 35 of the final permit as follows:

D.1.1 Part 70 Program [326 IAC 2-7] and Process Operation [326 IAC 6-3]

Pursuant to 326 IAC 2-7 (Part 70 Program) and 326 IAC 6-3 (Process Operation), the following facilities shall have an allowable PM emission limits:

- (a) Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour, the following equation is used:

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

Process / Facility	Process Weight Rate (tons/hour)	Truncated PM Allowable Emissions (lbs./hr)	PM₁₀ Allowable Emissions (lbs./hr)
Preblending Operation (PB1)	0.0825	0.37	0.37
Preblending Operation (PB2)	0.0825	0.37	0.37
Preblending Operation (PB3)	0.0825	0.37	0.37
Automatic Feeder System (AFS)	8.03	7.95	7.95
Pelletizing Operation (P1)	0.165	0.59	0.59
Pelletizing Operation (P2)	0.75	1.62	1.62
Pelletizing Operation (P3)	0.75	1.62	1.62
Pelletizing Operation (P4)	1.75	2.86	2.86
Pelletizing Operation (P5)	1.65	2.75	2.75
Pelletizing Operation (P)	3.0	4.10	4.10

The above PM emission limits shall also equivalent to PM₁₀ emission limits. Compliance with this condition will make 326 IAC 2-7 (Part 70 Program) requirements not applicable.

D.1.2 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

During the period between 12 and 18 months after issuance of this permit, the Permittee shall perform PM-10 testing of an automatic feeder system (AFS) utilizing Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner.

This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. ~~PM-10 includes filterable and condensable PM-10.~~ Compliance with the PM₁₀ limit shall be determined by a performance test conducted in accordance with Section C - Performance Testing. PM-10 includes filterable and condensable PM-10. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the automatic feeder system (AFS) is in compliance. ~~PM₁₀ limit shall be as follows:~~

Process: Automatic Feeder System (AFS)	PM₁₀ Limit
Baghouse (PS-009)	7.95 pounds per hour

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

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)
and Enhanced New Source Review (ENSR)

**Chemtrusion Indiana, Inc.
1403 Port Road, Jeffersonville, Indiana 47130**

F-019-9668, Pit ID-019-00091

On September 17, 1998, the Office of Air Management (OAM) had a notice published in the Clark County Evening News, Jeffersonville, Indiana, stating that Chemtrusion Indiana, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) and Enhanced New Source Review (ENSR) to operate a plastic extrusion facilities with a cartridge filters units for PM control. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 6, 1998, Ms. Evely Crooks of Environmental Compliance Source, Ltd., on behalf of Chemtrusion Indiana, Inc. submitted comments on the proposed FESOP and ENSR. The summary of the comments is as follows:

Comment 1:

Section A.2 (Emissions Units and Pollution Control Equipment Summary), on page 4 of 36, of the proposed permit, should be changed to full font arabic symbols for all emission units. A subsection (3) of section A.2, unit should be noted as EX1B. Subsections (8), (9), (10) and (14) do not exhaust to any vent. Palletizer units P5 and P6 in subsections (11) and (12) of section A.2 exhaust to stack F. Please change all related sections.

Response 1:

The information describing the source is descriptive information and does not constitute any enforceable conditions. However, the following changes have been made to section A.2 and D.1, on pages 4 and 26 of 35 the final permit as follows (changes are bolded for emphasis):

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

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

- (1) Three (3) preblending operations identified as PB₁ through PB₃, each with a maximum capacity of 165 pounds of additives and pigments per hour, particulate matter (PM) controlled a baghouse identified as PS010, exhausting at a stack identified as B;

- (2) One (1) automated feeder system (**AFS**) receives raw material as additive, pigments, polypropylene resin, rubber, fillers at a maximum rate of 80, 80, 10450, 3215 and 2250 pounds per hour, particulate matter controlled by a baghouse identified as PS009, exhausting at a stack identified as A;
- (3) One (1) extruder identified as EX₄**1B** contains different heat zones for polymerization of raw materials, maximum capacity of 330 pounds per hour, exhausting at a stack identified as E;
- (4) One (1) extruder identified as EX₂**2** contains different heat zones for polymerization of raw materials, maximum capacity of 1500 pounds per hour, exhausting at a stack identified as E;
- (5) One (1) extruder identified as EX₂**3** contains different heat zones for polymerization of raw materials, maximum capacity of 1500 pounds per hour, exhausting at a stack identified as E;
- (6) One (1) extruder identified as EX₅**5** contains different heat zones for polymerization of raw materials, maximum capacity of 3300 pounds per hour, exhausting at a stack identified as E;
- (7) One (1) extruder identified as EX₆**6** contains different heat zones for polymerization of raw materials, maximum capacity of 6000 pounds per hour, exhausting at a stack identified as E;
- (8) One (1) pelletizing process identified as P₄**1** with a maximum capacity of 330 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents ~~exhausting to a stack identified as D;~~
- (9) One (1) pelletizing process identified as P₂**2** with a maximum capacity of 1500 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents ~~exhausting to a stack identified as D;~~
- (10) One (1) pelletizing process identified as P₃**3** with a maximum capacity of 1500 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents, ~~exhausting to a stack identified as D;~~
- (11) One (1) pelletizing process identified as P₅**5** with a maximum capacity of 3300 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents, exhausting to a stack identified as ~~D~~ **F**;
- (12) One (1) pelletizing process identified as P₆**6** with a maximum capacity of 6000 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents, exhausting to a stack identified as ~~D~~ **F**;
- (13) One (1) extruder identified as EX₄**4** contains different heat zones for polymerization of raw materials, maximum capacity of 3500 pounds per hour, exhausting at a stack identified as E;

- (14) One (1) pelletizing process identified as P₄ 4 with a maximum capacity of 3500 pounds of polymerized plastic in a water bath with a centrifugal to remove a moisture contents, ~~exhausting to a stack identified as D;~~

D.1.1 Part 70 Program [326 IAC 2-7] and Process Operation [326 IAC 6-3]

Pursuant to 326 IAC 2-7 (Part 70 Program) and 326 IAC 6-3 (Process Operation), the following facilities shall have an allowable PM emission limits:

- (a) Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour, the following equation is used:

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

Process / Facility	Process Weight Rate (tons/hour)	Truncated PM Allowable Emissions (lbs./hr)
Preblending Operation (PB ₁ 1)	0.0825	0.37
Preblending Operation (PB ₂ 2)	0.0825	0.37
Preblending Operation (PB ₃ 3)	0.0825	0.37
Automatic Feeder System (AFS)	8.03	7.95
Pelletizing Operation (P ₁ 1)	0.165	0.59
Pelletizing Operation (P ₂ 2)	0.75	1.62
Pelletizing Operation (P ₃ 3)	0.75	1.62
Pelletizing Operation (P ₄ 4)	1.75	2.86
Pelletizing Operation (P ₅ 5)	1.65	2.75
Pelletizing Operation (P ₆ 6)	3.0	4.10

The above PM emission limits shall also equivalent to PM₁₀ emission limits. Compliance with this condition will make 326 IAC 2-7 (Part 70 Program) requirements not applicable.

D.1.3 Particulate Matter (PM)

The baghouses identified as PS009 and PS010 for PM control shall be in operation at all times when the preblending operation (~~PB₁, PB₂, PB₃~~ **PB1, PB2, PB3**) and automatic feeder system (AFS) are in operation and exhausting to the outside atmosphere.

D.1.5 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the preblending operation (~~PB₁, PB₂, PB₃~~ **PB1, PB2, PB3**) and automatic feeder system (AFS) when venting to the atmosphere. The baghouses (PS009 & PS010) inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter.

Inspections are optional when venting indoors. All defective bags shall be replaced.

Comment 2:

The building at the Source was constructed in 1996. There is no asbestos in the structure and none will be added. Chemtrusion objects to the inclusion of this non-applicable condition C.7 (Asbestos Abatement Projects) on page 19 of 36 in this permit.

Response 2:

Renovation is defined in 326 IAC 14-10-2 (38) as altering a facility or a component of a facility in any way. All areas where renovation or demolition are going to occur must be inspected by an accredited asbestos inspector. The language in the permit is the same as the Federal language found in 40 CFR 61, Subpart M. Not every renovation must be reported. If the Permittee's renovation will involve stripping, removing or disturbing two hundred sixty (260) linear feet on pipes, one hundred sixty (160) square feet on other facility components; or a total of thirty-five feet (35) cubic feet on all facility components or more of friable asbestos, then the Permittee must notify IDEM using an IDEM notification form at least ten (10) working prior to renovation.

Demolition is defined as removing supporting beams, walls or structures of a facility. 326 IAC 14-10-1(a)(1) states that the Permittee must properly notify IDEM of every demolition project, even if no asbestos is present. There have been no changes resulting from this comment.

Comment 3:

Chemtrusion requires clarification regarding timing in condition C.17 (General Reporting Requirements), the semi-annual report found on page 36 of 36 of the permit. Is the report due on a permit year cycle or a calendar year cycle?

Response 3:

The semiannual report will be due on the basis of a permit year cycle.

Comment 4:

Chemtrusion objects condition C.18 (Compliance with 40 CFR 82 and 326 IAC 22-1), on page 26 of 36 in the draft permit. This condition makes the source liable for any mistakes made by a contract HVAC firm working on ancillary building equipment. The source does not believe IDEM has the authority to impose such a condition.

Response 4:

40 CFR 82 regulates the handling of ozone-depleting substances such as Freon in a variety of processes and products including domestic and commercial refrigeration and air-conditioning units and portable fire extinguishers. Most sources include one or more subject units. Maintenance or repair of such units has the potential to release substances controlled under these rules. The condition C.18 (Compliance with 40 CFR 82 and 326 IAC 22-1), on page 26 of 35 of the final permit remains unchanged.

Comment 5:

Condition D.1.2 (Testing Requirements), on page 28 of 36 of the draft permit should be deleted. Chemtrusion does not accept this condition. It is our position that this test is totally unnecessary in view of the daily and periodic inspections of the dust control equipment which are more than sufficient to verify effective operation. This device can be configured to trigger an alarm in the event of a malfunction.

Response 5:

The potential particulate matter (PM) emissions from automatic feeder system (AFS) have been calculated by using an emission factor of 20 pounds of PM /tons of powder or granular raw materials into the system. The potential PM (or PM₁₀) emissions from facility are 703.40 tons per year, contributing more than 99 percent of PM emissions from the source. Pursuant to 326 IAC 6-3-2(c) (Process Operations: PM Emissions), the allowable PM emissions from the automatic feeder system (AFS) are 7.95 pounds per hour. Testing the PM (or PM₁₀) emissions from the automatic feeder system (AFS) will provide more accurate emission factors for the operations. Thus, testing gives a basis for demonstrating compliance with 326 IAC 6-3-2. The condition D.1.2 (Testing Requirements), on page 28 of 35 of the final permit will remain unchanged.

Comment 6:

Condition D.1.5 (Baghouse Inspections), on page 29 of 36 of the draft permit, should be change from a baghouse to a cartridge filter unit. Chemtrusion requests to perform inspection according to the manufacture's recommendations.

Response 6:

Condition D.1.6 (Baghouse Inspections), on page 29 of 35 of the final permit has been changed as follows (changes are bolded for emphasis):

D.1.5 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags **or cartridges** controlling the preblending operation (~~PB₁, PB₂, PB₃~~ **PB1, PB2, PB3**) and automatic feeder system (AFS) when venting to the atmosphere. The ~~baghouses~~ **cartridge filter unit** (PS009 & PS010) inspection shall be performed ~~within three months of redirecting vents to the atmosphere and every three months thereafter~~ **as per manufacturer specifications**. Inspections are optional when venting indoors. All defective bags **or cartridges** shall be replaced.

Comment 7:

Condition D.1.6 (Broken Bag or Failure Detection), on page 30 of 36 of the draft permit, should be modified because there is no compartment to shutdown and control units are cartridge filters.

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OAM has reviewed the manufacturer information for the cartridge units. Condition D.1.6 (Broken Bag or Failure Detection), on page 29 of 35 of the final permit, has been changed as follows:

D.1.6 Broken Bag or Failure Detection

In the event that bag **or cartridge** failure has been observed:

- (a) The affected ~~compartments~~ **failed cartridge filter units and associated facilities** will be shut down immediately until the failed **cartridge filter** units have been repaired or replaced. ~~For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.~~
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated, For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

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This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. ~~PM-10 includes filterable and condensable PM-10.~~ Compliance with the PM_{10} limit shall be determined by a performance test conducted in accordance with Section C - Performance Testing. PM-10 includes filterable and condensable PM-10. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the automatic feeder system (AFS) is in compliance. ~~PM₁₀ limit shall be as follows:~~

Process: Automatic Feeder System (AFS)	PM₁₀ Limit
Baghouse (PS-009)	7.95 pounds per hour

Appendix B: Emission Calculations

Company Name: Chemtrusion Indiana, Inc.
Address City IN Zip: 1403 Port Road, Jeffersonville, Indiana 47130
CP: 019-9668
Plt ID: 019-00091
Reviewer: Manoj P. Patel
Date: 08/21/1998

Process	SCC	Throughput in ton/hr	Emissions Factor in lb./ton Product			Potential emissions (tons/year)			C.E. for PM	Controlled Emissions in tons / year		PM Allowable Emissions	
			PM	PM10	VOC*	PM	PM10	VOC		PM	PM10	lbs./hr	tons/year
Preblending Operation (PB1 to PB3)	30101810	0.25	3	3	0	3.25	3.25	0.00	99.00%	0.03	0.03	1.61	7.04
Automatic Feeder System (AFS)	30101814	8.03	20	20	0	703.43	703.43	0.00	99.00%	7.03	7.03	16.56	72.51
Extruders (1 through 6)	-----	8.03	0	0	1	0.00	0.00	35.17	0.00%	0.00	0.00	-----	-----
Pelletizing Operations (1 through 6)	30101821	8.03	0.032	0.032	0	1.13	1.13	0.00	0.00%	1.13	1.13	16.56	72.51
										8.19	8.19		

* - Average Emission Factor Based on Cast Film Extruder @ 470F, 40% capture from hood.

Methodology:

All Emission Factors are taken from similar processes.

Potential Emissions = (E.F. in lb./ton)* (throughput in ton/hour) * 4.38

Controlled Emissions = Potential Emissions * (1-controlled efficiency)

E.F.. for Raw Material Unloading are based on the SCC: 30500707 & 30501222. MSDS for PVC Manufacturer shows that the material will be either in pellets or powder form.

Extruder VOC average E.F.from State of Wisconsin DNR Stack Test Results Summary sent to SPI. dated 12/5/1997.

PM Allowable emissions (lbs./hour) = 4.10 (P)^{0.67}, P = Process weight Rate in tons per hour as 326 IAC 6-3 (Process Operations)

PM Allowable Emissions (tons/year) = PM Allowable Emissions in lbs./hr * 4.38

**Appendix A: Emission Calculations
 Natural Gas Combustion Only
 MM Btu/hr 0.3 - < 10
 Direct Fired Heaters (OF-1 to 3)**

Company Name: Chemtrusion Indiana, Inc.
Address City IN Zip: 1403 Port Road, Jeffersonville, Indiana 47130
FESOP: 019-9668
Plt ID: 019- 00091
Reviewer: Manoj P. Patel
Date: 08/21/1998

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

3.6

31.5

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.1	0.1	0.01	1.6	0.1	1.3

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

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