

**CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT**

**Warehouse Services No. 5, LLC
1717 Lower New Harmony Road
Mt. Vernon, Indiana 47620**

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP-129-9933-00041	
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), and presented in the permit application.

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

The Permittee owns and operates a fiberglass manufacturing operation.

Responsible Official: Mr. Barry Cox
Source Address: 1717 Lower New Harmony Road, Mt. Vernon, Indiana 47620
Mailing Address: P.O. Box 665, Mt. Vernon, Indiana 47620
SIC Code: 3089
County Location: Posey
County Status: Attainment for all criteria pollutants
Source Status: Minor Source, under PSD Rules
Minor Source, under Title V Rules

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) paint booth for plastic sheets, designated as #1 and exhausts to a stack designated as #2.
- (b) One (1) sheet trimming area for plastic sheets and exhausts to the atmosphere.
- (c) One (1) electric oven for plastic sheets and exhausts to a stack designated as #1.
- (d) One (1) electric dryer for plastic sheets and exhausts to a stack designated as #3.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is not required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) This new source is not subject to the Part 70 Permit requirements, as defined in 326 IAC 2-7-1(22), because the potential to emit (PTE) of:
 - 1. each criteria pollutant is less than 100 tons per year,
 - 2. a single hazardous air pollutant (HAP) is less than 10 tons per year, and
 - 3. any combination of HAPs is less than 25 tons/year.

SECTION B GENERAL CONSTRUCTION AND OPERATION CONDITIONS

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]

B.1 General Construction Conditions

- (a) The data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).
- (b) 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.

B.2 Effective Date of the Permit [IC13-15-5-3]

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

B.3 Revocation of Permits [326 IAC 2-1-9(b)]

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

B.4 Permit Review Rules [326 IAC 2]

Notwithstanding Operation Condition B.11, all requirements and conditions of this construction permit 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).

B.5 First Time Operation Permit [326 IAC 2-1-4]

This document shall also become a first-time operation 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 the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction 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 document.

- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1-7.1 (Fees).

Operation Conditions

B.6 General Operation Conditions

- (a) The data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).
- (b) The Permittee shall 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 (IC13-17) and the rules promulgated thereunder.

B.7. Preventive Maintenance Plan [326 IAC 1-6-3]

Pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:

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

The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

B.8 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

B.9 Transfer of Permit [326 IAC 2-1-6]

Pursuant to 326 IAC 2-1-6 (Transfer of Permits):

- (a) In the event that ownership of this plastics coating operation is changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.
- (b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.
- (c) The OAM shall reserve the right to issue a new permit.

B.10 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

B.11 Availability of Permit [326 IAC 2-1-3(I)]

Pursuant to 326 IAC 2-1-3(I), the Permittee shall maintain the applicable permit on the premises of the source and shall make this permit available for inspection by the IDEM, or other public official having jurisdiction.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitation and Standards

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential emissions of particulate matter (PM) are less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase the potential emissions to the following:
- (1) 25 tons per year or more (326 IAC 2-1),
 - (2) 100 tons per year or more, and are greater than 10 tons per year for a single HAP or combination HAPs greater than 25 tons per year (326 IAC 2-7),
 - (3) 250 tons per year or more (326 IAC 2-2),

from the equipment covered in this construction permit must be approved by the Office of Air Management (OAM) before such change may occur.

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

Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

- (a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
- (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

Record Keeping Requirements

C.3 General Record Keeping Requirements [326 IAC 2-1-3]

- (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 and available within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (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.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.4 General Reporting Requirements [326 IAC 2-1-3]

- (a) 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
- (e) 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.
- (c) Unless otherwise specified in this permit, any report shall be submitted within thirty (30) days of the end of the reporting period.
- (d) All instances of deviations must be clearly identified in such reports. A reportable 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 or failure to monitor or record the required compliance monitoring is a deviation.

- (e) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (f) 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.

SECTION D.1

FACILITY CONDITIONS

- (a) One (1) paint booth for plastic sheets, designated as #1 and exhausts to a stack designated as #2.
- (b) One (1) sheet trimming area for plastic sheets and exhausts to the atmosphere.
- (c) One (1) electric oven for plastic sheets and exhausts to a stack designated as #1.
- (d) One (1) electric dryer for plastic sheets and exhausts to a stack designated as #3.

Emission Limitation and Standards

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate for the paint booth shall comply with 326 IAC 6-3-2(c) using 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:

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

D.1.2 New Facilities; General Reduction Requirements [326 IAC 8-1-6]

- (a) That the input VOC including clean up solvent, minus the VOC solvent shipped out, delivered to the applicators of the paint booth shall be limited to 24 tons per year, rolled on a monthly basis. Therefore, the Best Available Control Technology (BACT) requirements of 326 IAC 8-1-6 will not apply.
- (b) During the first 12 months of operation, the input raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed two (2) tons per month.

D.1.3 PSD Minor Source

Pursuant to 326 IAC 2-2, this source shall be considered minor since the VOC emissions are less than 250 tons per year.

Compliance Determination Requirements

D.1.4 Testing Requirements

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with 326 IAC 3-6 (Source Sampling).

D.1.5 Volatile Organic Compounds

Compliance with the styrene content and usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements

D.1.6 Record Keeping Requirements [326 IAC 2-1-3]

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.
1. The amount of VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 2. A log of the dates of use;
 3. The monthly volume-weighted average VOC content of the coatings as applied;
 4. The cleanup solvent usage for each month;
 5. The total VOC usage for each month;
 6. Monthly emissions in pounds of VOC; and
 7. The weight of VOC emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements [326 IAC 2-1-3]

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

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

326 IAC 1-6-1 Applicability of rule

Sec. 1. The requirements of this rule (326 IAC 1-6) shall apply to the owner or operator of any facility which has the potential to emit twenty-five (25) pounds per hour of particulates, one hundred (100) pounds per hour of volatile organic compounds or SO₂, or two thousand (2,000) pounds per hour of any other pollutant; or to the owner or operator of any facility with emission control equipment which suffers a malfunction that causes emissions in excess of the applicable limitation.

326 IAC 1-2-39 “Malfunction” definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. (Air Pollution Control Board; 326 IAC 1-2-39; filed Mar 10, 1988, 1:20 p.m. : 11 IR 2373)

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

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

**Indiana Department of Environmental Management
Office of Air Management
Compliance Data Section**

Quarterly Report

Company Name: Posey County Warehousing, Inc.
Location: 1717 Lower New Harmony Road, Mt. Vernon, Indiana 47620
Permit No.: 129-9933-00041
Source: Paint Booth #1
Pollutant: VOC PTE
Limit: 24.0 tons per twelve month period

Year: _____

Month	VOC Usage/Emissions (tons/month)	VOC Usage/Emissions for previous month(s) (tons)	VOC Usage/Emissions for twelve month period (tons)

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for New Construction and Operation

Source Background and Description

Source Name: Posey County Warehousing, Inc.
 Source Location: 1717 Lower New Harmony Road, Mt. Vernon, Indiana 47620
 County: Posey
 Construction Permit No.: CP-129-9933-00041
 SIC Code: 3089
 Permit Reviewer: Nysa L. James

The Office of Air Management (OAM) has reviewed an application from Posey County Warehousing, Inc. relating to the construction and operation of a plastic coating operation, consisting of the following equipment:

- (a) One (1) paint booth for plastic sheets, designated as #1 and exhausts to a stack designated as #2.
- (b) One (1) sheet trimming area for plastic sheets and exhausts to the atmosphere.
- (c) One (1) electric oven for plastic sheets and exhausts to a stack designated as #1.
- (d) One (1) electric dryer for plastic sheets and exhausts to a stack designated as #3.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
1	oven	40	1	962	184
2	paint booth	40	1.67	3134	130
3	dryer	21	1	842	156

Enforcement Issue

IDEM is aware that this plastic coating operation has been constructed and operated prior to receipt of the proper permit. 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 construction and operation be approved. This recommendation is based on the following facts and conditions:

Information, unless otherwise stated, used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 9, 1998, with additional information received on August 18, 1998.

Emissions Calculations

The emissions were determined by the Office of Air Management. Pursuant to 326 IAC 17-1-2, the source has requested the information submitted to determine emissions to be confidential.

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)	12.04	5.01
Particulate Matter (PM10)	12.04	5.01
Sulfur Dioxide (SO ₂)	--	--
Volatile Organic Compounds (VOC)	--	30.89
Carbon Monoxide (CO)	--	--
Nitrogen Oxides (NO _x)	--	--
Single Hazardous Air Pollutant (HAP)	--	--
Combination of HAPs	--	--

- (a) Allowable emissions are determined from the applicability of rule 326 IAC 6-3.
- (i) The paint booth shall comply with 326 IAC 6-3-2(c) using the following equation:
- $$E = 4.10P^{0.67}; \quad \text{where } P = \text{process weight in tons per hour}$$
- E = rate of emission in pounds per hour.
- (ii) The shearing operation shall comply with 326 IAC 6-3-2(c) using the following equation:
- $$E = 4.10P^{0.67}; \quad \text{where } P = \text{process weight in tons per hour}$$
- E = rate of emission in pounds per hour.
- $$E = 2.75 \text{ lb/hr}; 2.75 \text{ lb/hr} * 8760 \text{ hr/yr} * \text{ton}/2000 \text{ lb} = 12.03 \text{ ton/yr.}$$
- (b) The potential emissions before control are less than the allowable emissions, therefore, the potential emissions before control are used for the permitting determination.

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

County Attainment Status

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Posey County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Posey County has been classified as attainment or unclassifiable for PM¹⁰, NO_x, SO₂ and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

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	5.01
PM10	5.01
SO ₂	0.00
VOC	30.89
CO	0.00
NO _x	0.00
Single HAP	0.00
Combination HAPs	0.00

- (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 and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

Federal Rule Applicability

- (a) There are no New Source Performance Standards 40 CFR Part 60 applicable to this facility.
- (b) There are no NESHAP 40 CFR Part 63 applicable to this facility.

State Rule Applicability

326 IAC 5-1-2 (Opacity Limitations):

Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

- (a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
- (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

326 IAC 6-3-2(c) (Process Operations):

Pursuant to 326 IAC 6-3 (Process Operations):

- (a) The paint booth and shearing operation shall comply with 326 IAC 6-3-2(c) using the following equation:

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

326 IAC 8-1-6 (New facilities; general reduction requirements):

- (a) That the input VOC including clean up solvent, minus the VOC solvent shipped out, delivered to the applicators of the paint booth shall be limited to 24 tons per year, rolled on a monthly basis. Therefore, the Best Available control Technology (BACT) requirements of 326 IAC 8-1-6 will not apply.
- (b) During the first 12 months of operation, the input raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed two (2) tons per month.

No other 326 IAC 8 rules apply.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants 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) Construction Permit Application Form Y.

- (a) None of these listed air toxics will be emitted from this proposed construction.

Conclusion

The construction of this plastic coating operation will be subject to the conditions of the attached proposed **Construction Permit No. CP-129-9933-00041**.

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

Addendum to the
Technical Support Document for New Construction and Operation

Source Name: Warehouse Services No. 5, LLC
Source Location: 1717 Lower New Harmony Road, Mt. Vernon, IN. 47620
County: Posey
Construction Permit No.: CP-129-9933-00041
SIC Code: 3089
Permit Reviewer: Nysa L. James

On September 23, 1998, the Office of Air Management (OAM) had a notice published in the Mount Vernon Democrat, Mount Vernon, Indiana, stating that Posey County Warehousing, Inc. had applied for a construction permit to construct and operate a plastic sheet coating operation. The notice also stated that OAM proposed to issue a permit for this installation 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 5, 1998, Posey County Warehousing, Inc. submitted a transfer of ownership request. The request consists of a transfer of the source from Posey County Warehousing, Inc. to Warehouse Services No. 5, LLC. The name listed on the original construction permit is amended to reflect the above mentioned transfer of ownership. With this transfer of ownership, the responsible official shall change from Bill Gillenwater to Barry Cox.

ERR
VOC and Particulate
From Surface Coating Operations

Company Name: Posey County Warehousing, Inc.
 Address City IN Zip: 1717 Lower New Harmony Road, Mt. Vernon, IN. 47620
 CP: 129-9933
 Pft. ID: 129-00041
 Reviewer: NLJ
 Date: 7/23/98

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Hydrophilic Coating - DLTD	7.3	95.00%	64.2%	30.8%	64.2%	5.00%	0.02200	142.000	6.31	2.26	7.05	169.27	30.89	5.01	45.15	0%

State Potential Emissions

Add worst case coating to all solvents

7.05 169.27 30.89 5.01

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
 Total = Worst Coating + Sum of all solvents used