NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Review and
Minor Source Operating Permit (MSOP)

for Mervis Plastics Indianapolis in Marion County

MSOP No.: M097-41000-00738

The Indiana Department of Environmental Management (IDEM) has received an application from Mervis Plastics Indianapolis, located at 6550 E. 30th St., Suite 151, Indianapolis, IN 46219, for a new source review and MSOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Mervis Plastics Indianapolis to make certain changes at its existing source and to continue to operate its existing source. Mervis Plastics Indianapolis has applied to add two (2) new Granulator units, a new float/sink process line and an elutriation system. The additional PTE of these new units will require the source to transition from a registration to a MSOP.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g. changes that add or modify synthetic minor emission limits).

IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

IDEM is aware that the Cumberland 1400 granulator, identified as unit G-6 has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft permit contains provisions to bring unpermitted equipment into compliance with construction and operation permit rules.

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

Indianapolis Public Library
5420 E. 38th Street
Indianapolis, IN 46218

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

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

How can you participate in this process?

The date that this notice is posted on IDEM's website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M097-41000-00738 in all correspondence.

Comments should be sent to:

Taylor Wade
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Taylor Wade or (317) 233-0868
Or dial directly: (317) 233-0868
Fax: (317) 232-6749 attn: Taylor Wade
E-mail: twade@idem.IN.gov

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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

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

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

Heath Hartley, Section Chief
Permits Branch
Office of Air Quality
Minor Source Operating Permit

OFFICE OF AIR QUALITY

Mervis Plastics Indianapolis
6550 E. 30th St., Suite 151
Indianapolis, Indiana 46219

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

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

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

Operation Permit No.: M097-41000-00738
Master Agency Interest ID: 108768

Issued by:
Heath Hartley, Section Chief
Permits Branch
Office of Air Quality

Issuance Date:
Expiration Date:
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SECTION A  SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary plastic recycling plant.

Source Address: 6550 E. 30th St., Suite 151, Indianapolis, Indiana 46219
General Source Phone Number: (317) 363-2236
SIC Code: 5093 (Scrap and Waste Materials)
County Location: Marion Outside Center, Perry, and Wayne Townships
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit Program

Minor Source, under PSD and Emission Offset Rules
Minor Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) G-1 Cumberland 1000 (Line 1B), constructed in 2014, consisting of:

(1) One (1) Cumberland granulator, identified as G-1, with a maximum capacity of 2,000 pounds per hour;

(2) One (1) totally enclosed pneumatic conveying system with an air flow of 2,240 actual cubic feet per minute;

(3) One (1) cyclone material separator to collect the product and to remove off-spec fines and metal, identified as Material Separator 1 with one (1) set of bag filters for particulate control, identified as G-1 bag filters, exhausting into the building.

(4) One (1) container loadout drop point, identified as G-1 Product Drop

(b) G-2 Cumberland 1400 (Line 1A), constructed in 2014, consisting of:

(1) One (1) Cumberland granulator, identified as G-2, with a maximum capacity of 4,000 pounds per hour;

(2) One (1) totally enclosed pneumatic conveying system with an air flow of 2,600 actual cubic feet per minute;

(3) One (1) cyclone material separator to collect the product and to remove off-spec fines and metal, identified as Material Separator 2 with one (1) set of bag filters for particulate control identified as G-2 bag filters, exhausting into the building.

(4) One (1) loadout drop point, identified as G-2 Product Drop

(c) G-3 Cumberland 1000 (Line 2), constructed in 2016, consisting of:
(1) One (1) Cumberland granulator, identified as G-3, with a maximum capacity of 2,000 pounds per hour;

(2) One (1) totally enclosed pneumatic conveying system with an air flow of 2,240 actual cubic feet per minute;

(3) One (1) cyclone material separator to collect the product and to remove off spec fines and metal, identified as Material Separator 3 with one (1) set of bag filters for particulate control identified as G-3 bag filters, exhausting into the building.

(4) One (1) loadout drop point, identified as G-3 Product Drop

(d) G-4 Cumberland 1000 (Line 3), constructed in 2016, consisting of:

(1) One (1) Cumberland granulator, identified as G-4, with a maximum capacity of 2,000 pounds per hour

(2) One (1) totally enclosed pneumatic conveying system with an air flow of 2,240 actual cubic feet per minute

(3) One (1) cyclone material separator to collect the product and to remove off spec fines and metal, identified as Material Separator 4 with one (1) set of bag filters for particulate control identified as G-4 bag filters, exhausting into the building.

(4) One (1) loadout drop point, identified as G-4 Product Drop

(e) G-5 Cumberland 1000 (Line 5), constructed in 2016, consisting of:

(1) One (1) Cumberland granulator, identified as G-5, with a maximum capacity of 2,000 pounds per hour

(2) One (1) totally enclosed pneumatic conveying system with an air flow of 2,240 actual cubic feet per minute with one (1) set of bag filters for particulate control identified as G-5 bag filters, exhausting into the building.

(3) One (1) cyclone material separator to collect the product and to remove off spec fines and metal, identified as Material Separator 5

(4) One (1) loadout drop point, identified as G-5 Product Drop

(f) G-6 Cumberland 1400 (Line 4), constructed in 2016, consisting of:

(1) One (1) Cumberland granulator, identified as G-6, with a maximum capacity of 4,000 pounds per hour

(2) One (1) totally enclosed pneumatic conveying system with an air flow of 2,600 actual cubic feet per minute;

(3) One (1) cyclone material separator to collect the product and to remove off spec fines and metal, identified as Material Separator 6 with one (1) set of bag filters for particulate control identified as G-6 bag filters, exhausting into the building.

(4) One (1) loadout drop point, identified as G-6 Product Drop

(g) FS-1 (Line 6), constructed in 2016, consisting of:
(1) One (1) Float/Sink line, identified as FS-1, with a maximum capacity of 2,200 pounds per hour, consisting of:

(2) One (1) material drop point, identified as FS-1 Drop 1, with a maximum capacity of 2,200 pounds per hour

(3) One (1) material drop point, identified as FS-1 Drop 2, with a maximum capacity of 2,200 pounds per hour

(4) One (1) material drop point, identified as FS-1 Drop 3, with a maximum capacity of 2,200 pounds per hour

(5) Two (2) cyclone material separators to collect the product and to remove off spec fines and metal, identified as Float/Sink Line Separator with two (2) sets of bag filters for particulate control identified as FS-1 bag filters #1 and FS-1 bag filters #2, exhausting into the building.

(h) FS-2 (Line 7), approved for construction in 2019, consisting of:

(1) One (1) Float/Sink line, identified as FS-2, with a maximum capacity of 2,200 pounds per hour, consisting of:

(2) One (1) Econogrind granulator, identified as G-7, with a maximum capacity of 2,200 pounds per hour;

(3) One (1) material drop point, identified as FS-2 Drop 1, with a maximum capacity of 2,200 pounds per hour;

(4) One (1) material drop point, identified as FS-2 Drop 2, with a maximum capacity of 2,200 pounds per hour;

(5) One (1) material drop point, identified as FS-2 Drop 3, with a maximum capacity of 2,200 pounds per hour;

(6) One (2) cyclone material separator to collect the product and to remove off spec fines and metal, identified as Float/Sink Line Separator, with two (2) sets of bag filters for particulate control identified as FS-2 bag filters #1 and FS-2 bag filter #2, exhausting into the building.

(7) One (1) Natural-gas fired boiler, identified as Boiler-1, with a maximum heat input capacity of 0.4 MMBtu/hr, exhausting indoors

(i) Material Transfer Station (Line 9), constructed in 2017, consisting of:

(1) One (1) material transfer station, identified as Material Transfer Station Product Drop, with a maximum capacity of 2,200 pounds per hour

(2) One (1) cyclone material separator to collect the product and to remove off spec fines and metal, identified as MTS Separator with one (1) set of bag filters for particulate control identified as MTS bag filters, exhausting into the building.

(j) E-1 Elutriation System (Line 11), approved for construction in 2019, consisting of:

(1) One (1) elutriator separator, identified as E-1, with a maximum capacity of 2,400 pounds per hour with one (1) set of bag filters for particulate control identified as
E-1 bag filters, exhausting into the building.

(2) One (1) totally enclosed pneumatic conveying system with an air flow of 2,240 actual cubic feet per minute;

(3) Two (2) loadout drop point, identified as E-1 Product Drop

(k) Miscellaneous

(1) One (1) baler, identified as B-1;

(2) Three (3) SSI shredders, identified as S-1, S-2, and S-3.

(3) Paved roadways and parking lots with public access.
SECTION B  GENERAL CONDITIONS

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

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

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

(a) This permit, M097-41000-00738, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

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

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

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.
### B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M097-41000-00738 and issued pursuant to permitting programs approved into the state implementation plan have been either:

1. incorporated as originally stated,
2. revised, or
3. deleted.

(b) All previous registrations and permits are superseded by this permit.

### B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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

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

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

Request for renewal shall be submitted to:

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

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

1. Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
2. If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

B.14 Source Modification Requirement

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

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

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

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

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

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

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

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

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

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

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:
Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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

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

C.1 Permit Revocation [326 IAC 2-1.1-9]

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

(a) Violation of any conditions of this permit.

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

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

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

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

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).
C.6 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.7 Performance Testing [326 IAC 3-6]

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

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

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

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

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

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

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

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

C.10 Instrument Specifications [326 IAC 2-1.1-11]

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

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

C.11 Response to Excursions or Exceedances

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

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

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

(1) initial inspection and evaluation;
(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

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

(1) monitoring results;
(2) review of operation and maintenance procedures and records; and/or
(3) inspection of the control device, associated capture system, and the process.

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

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

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

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

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.
Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.13 Malfunctions Report [326 IAC 1-6-2]

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

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

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

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

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

C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

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

C.15 General Reporting Requirements [326 IAC 2-1.1-11][326 IAC 2-6.1-2][IC 13-14-1-13]

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

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

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

(c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.
SECTION D.1  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) G-1 Cumberland 1000 (Line 1B), constructed in 2014, consisting of:
   (1) One (1) Cumberland granulator, identified as G-1, with a maximum capacity of 2,000 pounds per hour
   (2) One (1) totally enclosed pneumatic conveying system with an air flow of 2,240 actual cubic feet per minute
   (3) One (1) cyclone material separator to collect the product and to remove off-spec fines and metal, identified as Material Separator 1 with one (1) set of bag filters for particulate control, identified as G-1 bag filters, exhausting into the building.
   (4) One (1) container loadout drop point, identified as G-1 Product Drop

(b) G-2 Cumberland 1400 (Line 1A), constructed in 2014, consisting of:
   (1) One (1) Cumberland granulator, identified as G-2, with a maximum capacity of 4,000 pounds per hour
   (2) One (1) totally enclosed pneumatic conveying system with an air flow of 2,600 actual cubic feet per minute
   (3) One (1) cyclone material separator to collect the product and to remove off-spec fines and metal, identified as Material Separator 2 with one (1) set of bag filters for particulate control identified as G-2 bag filters, exhausting into the building.
   (4) One (1) loadout drop point, identified as G-2 Product Drop

(c) G-3 Cumberland 1000 (Line 2), constructed in 2016, consisting of:
   (1) One (1) Cumberland granulator, identified as G-3, with a maximum capacity of 2,000 pounds per hour
   (2) One (1) totally enclosed pneumatic conveying system with an air flow of 2,240 actual cubic feet per minute
   (3) One (1) cyclone material separator to collect the product and to remove off spec fines and metal, identified as Material Separator 3 with one (1) set of bag filters for particulate control identified as G-3 bag filters, exhausting into the building.
   (4) One (1) loadout drop point, identified as G-3 Product Drop

(d) G-4 Cumberland 1000 (Line 3), constructed in 2016, consisting of:
   (1) One (1) Cumberland granulator, identified as G-4, with a maximum capacity of 2,000 pounds per hour
   (2) One (1) totally enclosed pneumatic conveying system with an air flow of 2,240 actual cubic feet per minute
(3) One (1) cyclone material separator to collect the product and to remove off spec fines and metal, identified as Material Separator 4 with one (1) set of bag filters for particulate control identified as G-4 bag filters, exhausting into the building.

(4) One (1) loadout drop point, identified as G-4 Product Drop

(e) G-5 Cumberland 1000 (Line 5), constructed in 2016, consisting of:

(1) One (1) Cumberland granulator, identified as G-5, with a maximum capacity of 2,000 pounds per hour

(2) One (1) totally enclosed pneumatic conveying system with an air flow of 2,240 actual cubic feet per minute with one (1) set of bag filters for particulate control identified as G-5 bag filters, exhausting into the building.

(3) One (1) cyclone material separator to collect the product and to remove off spec fines and metal, identified as Material Separator 5

(4) One (1) loadout drop point, identified as G-5 Product Drop

(f) G-6 Cumberland 1400 (Line 4), constructed in 2016, consisting of:

(1) One (1) Cumberland granulator, identified as G-6, with a maximum capacity of 4,000 pounds per hour

(2) One (1) totally enclosed pneumatic conveying system with an air flow of 2,600 actual cubic feet per minute

(3) One (1) cyclone material separator to collect the product and to remove off spec fines and metal, identified as Material Separator 6 with one (1) set of bag filters for particulate control identified as G-6 bag filters, exhausting into the building.

(4) One (1) loadout drop point, identified as G-6 Product Drop

(g) FS-1 (Line 6), constructed in 2016, consisting of:

(1) One (1) Float/Sink line, identified as FS-1, with a maximum capacity of 2,200 pounds per hour, consisting of:

(2) One (1) material drop point, identified as FS-1 Drop 1, with a maximum capacity of 2,200 pounds per hour

(3) One (1) material drop point, identified as FS-1 Drop 2, with a maximum capacity of 2,200 pounds per hour

(4) One (1) material drop point, identified as FS-1 Drop 3, with a maximum capacity of 2,200 pounds per hour

(5) Two (2) cyclone material separators to collect the product and to remove off spec fines and metal, identified as Float/Sink Line Separator with two (2) sets of bag filters for particulate control identified as FS-1 bag filters #1 and FS-1 bag filters #2, exhausting into the building.

(h) FS-2 (Line 7), approved for construction in 2019, consisting of:
(1) One (1) Float/Sink line, identified as FS-2, with a maximum capacity of 2,200 pounds per hour, consisting of:

(2) One (1) Econogrind granulator, identified as G-7, with a maximum capacity of 2,200 pounds per hour

(3) One (1) material drop point, identified as FS-2 Drop 1, with a maximum capacity of 2,200 pounds per hour

(4) One (1) material drop point, identified as FS-2 Drop 2, with a maximum capacity of 2,200 pounds per hour

(5) One (1) material drop point, identified as FS-2 Drop 3, with a maximum capacity of 2,200 pounds per hour

(6) One (2) cyclone material separator to collect the product and to remove off spec fines and metal, identified as Float/Sink Line Separator, with two (2) sets of bag filters for particulate control identified as FS-2 bag filters #1 and FS-2 bag filter #2, exhausting into the building.

(7) One (1) Natural-gas fired boiler, identified as Boiler-1, with a maximum heat input capacity of 0.4 MMBtu/hr, exhausting indoors

(i) Material Transfer Station (Line 9), constructed in 2017, consisting of:

(1) One (1) material transfer station, identified as Material Transfer Station Product Drop, with a maximum capacity of 2,200 pounds per hour;

(2) One (1) cyclone material separator to collect the product and to remove off spec fines and metal, identified as MTS Separator with one (1) set of bag filters for particulate control identified as MTS bag filters, exhausting into the building.

(j) E-1 Elutriation System (Line 11), approved for construction in 2019, consisting of:

(1) One (1) elutriator separator, identified as E-1, with a maximum capacity of 2,400 pounds per hour with one (1) set of bag filters for particulate control identified as E-1 bag filters, exhausting into the building.

(2) One (1) totally enclosed pneumatic conveying system with an air flow of 2,240 actual cubic feet per minute

(3) Two (2) loadout drop point, identified as E-1 Product Drop

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

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

D.1.1 Particulate  [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2 (a), particulate matter (PM) emissions from each of the units listed above shall be limited to 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot) of exhaust air.

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

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

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

D.1.3 Particulate Control

In order to assure compliance with Condition D.1.1, the bag filters for particulate control shall be in operation and control emissions from each cyclone separator at all times the cyclone separator is in operation.

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

D.1.4 Filter Inspections

The Permittee shall perform quarterly inspections of the bag filters controlling particulate from the plastic recycling processing lines to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

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

D.1.5 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.4, the Permittee shall maintain records of the dates and results of the inspections.

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.
SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(9) One (1) Natural-gas fired boiler, identified as Boiler-1, with a maximum heat input capacity of 0.4 MMBtu/hr, exhausting indoors

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

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

D.2.1 Particulate Emissions [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter emissions from Boiler-1 shall not exceed 0.01 grains per dry standard cubic foot of natural gas burned.

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for this facility. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<table>
<thead>
<tr>
<th><strong>Company Name:</strong></th>
<th>Mervis Plastics-Indianapolis</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Address:</strong></td>
<td>6550 E. 30th St., Suite 151</td>
</tr>
<tr>
<td><strong>City:</strong></td>
<td>Indianapolis, Indiana 46219</td>
</tr>
<tr>
<td><strong>Phone #:</strong></td>
<td>(317) 363-2236</td>
</tr>
<tr>
<td><strong>MSOP #:</strong></td>
<td>M097-41000-00738</td>
</tr>
</tbody>
</table>

I hereby certify that Mervis Plastics-Indianapolis is:  
☐ still in operation.  
☐ no longer in operation.  

I hereby certify that Mervis Plastics-Indianapolis is:  
☐ in compliance with the requirements of MSOP M097-41000-00738.  
☐ not in compliance with the requirements of MSOP M097-41000-00738.

<table>
<thead>
<tr>
<th><strong>Authorized Individual (typed):</strong></th>
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<tbody>
<tr>
<td><strong>Title:</strong></td>
</tr>
<tr>
<td><strong>Signature:</strong></td>
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<td><strong>Date:</strong></td>
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</table>

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

<table>
<thead>
<tr>
<th><strong>Noncompliance:</strong></th>
</tr>
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<tbody>
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**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

**OFFICE OF AIR QUALITY**

**COMPLIANCE AND ENFORCEMENT BRANCH**

**FAX NUMBER: (317) 233-6865**

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


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

**THIS INCIDENT MEETS THE DEFINITION OF “MALFUNCTION” AS LISTED ON REVERSE SIDE? Y N**

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

---

| COMPANY: __________________________________________________________ PHONE NO. (____)__________________ |
| LOCATION: (CITY AND COUNTY)________________________________________ |
| PERMIT NO. __________________ AFS PLANT ID: ____________ AFS POINT ID: ____________ INSP: ____________ |
| CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: ____________________________________________ |

**DATE/TIME MALFUNCTION STARTED: _____ / _____ / 20_____ ________ AM / PM**

**ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: ________________________________________**

**DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE _____ / _____ / 20_____ ________ AM/PM**

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

**ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION:____________________________**

**MEASURES TAKEN TO MINIMIZE EMISSIONS:________________________________________________________**

**REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:**

**CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:**

**CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:**

**CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:**

**INTERIM CONTROL MEASURES: (IF APPLICABLE):____________________________________________________________**

**MALFUNCTION REPORTED BY: ______________________ TITLE: ______________________**

(SIGNATURE IF FAXED)

**MALFUNCTION RECORDED BY: _______________________ DATE: __________________ TIME: __________________**

*SEE PAGE 2

PAGE 1 OF 2
Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 “Malfunction” definition

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

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

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

________________________________________________________________________
________________________________________________________________________

PAGE 2 OF 2
Source Name: Mervis Plastics Indianapolis
Source Location: 6550 E. 30th Street, Suite 151, Indianapolis, IN 46219
County: Marion (Warren Township)
SIC Code: 5093 (Scrap and Waste Materials)
Operation Permit No.: M 097-41000-00738
Permit Reviewer: Taylor Wade

On January 31, 2019, the Office of Air Quality (OAQ) received an application from Mervis Plastics Indianapolis related to the construction and operation of new emission units at an existing stationary plastic recycling plant and transition from a Registration to a MSOP.

Source Definition

6550 East LLC is the owner and operator of a 600,000 square foot commercial/industrial building (Plant A) located at 6550 E. 30th St, Indianapolis, IN 46219. It leases Plant A’s space to multiple tenants. Mervis Plastics Indianapolis operates a plastic recycling facility (Plant B) out of Plant A. IDEM, OAQ has examined whether these two plants are part of the same source. The term “source” is defined at 326 Indiana Administrative Code (IAC) 1-2-73. The Indiana Administrative Code is available on the Internet. In order for these plants to be considered one source, they must meet all three of the following criteria:

1. the plants must be under common ownership or common control;

2. the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,

3. the plants must be located on the same, contiguous or adjacent properties.

Both plants are owned and controlled by Mervis Industries, Inc., the parent company. Since common ownership and common control exists, the first element of the definition of source is met.


A plant is a support facility if it dedicates 50% or more of its output to another plant. Plant B does not send any output to Plant A. Plant B uses a third of Plant A’s total space. Plant A’s boiler sends 20% of its heating output to Plant B. Since the plants do not have the same two-digit SIC Code and do not have a support facility relationship, they do not meet the second element of the source definition.

The last element of the definition is whether the plants are located on the same, contiguous or adjacent properties. The plants are located on the same property, meeting the third element of the source definition.
Since the plants do not meet all three elements of the source definition, IDEM, OAQ has determined that they are not part of the same source.

**Existing Approvals**

The source has been operating under Registration No. 097-38606-00738, issued on June 28, 2017. There have been no subsequent approvals issued.

Due to this application, the source is transitioning from a Registration to a MSOP.

**County Attainment Status**

The source is located in Marion County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.¹</td>
</tr>
<tr>
<td>PM₂₅</td>
<td>Unclassifiable or attainment effective April 5, 2005, for the annual PM₂₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM₂₅ standard.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Cannot be classified or better than national standards.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011.</td>
</tr>
</tbody>
</table>

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

(a) **Ozone Standards**

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

(b) **PM₂₅**

Marion County has been classified as attainment for PM₂₅. Therefore, direct PM₂₅, SO₂, and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) **Other Criteria Pollutants**

Marion County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.
The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit (326 IAC 2-7) and MSOP (326 IAC 2-6.1) applicability and source status under Section 112 of the Clean Air Act (CAA).

### Greenhouse Gas (GHG) Emissions

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

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

### Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Mervis Plastics Indianapolis on January 31, 2019, relating to the construction of two (2) new Granulator units, a new float/sink process line and an elutriation system. The additional PTE of these new units will require the source to transition from a registration to a MSOP.

The following is a list of the existing emission units and pollution control device(s):

(a) **G-1 Cumberland 1000 (Line 1B)**, constructed in 2014, consisting of:

1. One (1) Cumberland granulator, identified as G-1, with a maximum capacity of 2,000 pounds per hour;
2. One (1) totally enclosed pneumatic conveying system with an air flow of 2,240 actual cubic feet per minute;
3. One (1) cyclone material separator to collect the product and to remove off-spec fines and metal, identified as Material Separator 1 with one (1) set of bag filters for particulate control, identified as G-1 bag filters, exhausting into the building.
4. One (1) container loadout drop point, identified as G-1 Product Drop

(b) **G-2 Cumberland 1400 (Line 1A)**, constructed in 2014, consisting of:

1. One (1) Cumberland granulator, identified as G-2, with a maximum capacity of 4,000 pounds per hour;
2. One (1) totally enclosed pneumatic conveying system with an air flow of 2,600 actual cubic feet per minute;
3. One (1) cyclone material separator to collect the product and to remove off-spec fines and metal, identified as Material Separator 2 with one (1) set of bag filters for particulate control identified as G-2 bag filters, exhausting into the building.
4. One (1) loadout drop point, identified as G-2 Product Drop
(c) G-3 Cumberland 1000 (Line 2), constructed in 2016, consisting of:

(1) One (1) Cumberland granulator, identified as G-3, with a maximum capacity of 2,000 pounds per hour;

(2) One (1) totally enclosed pneumatic conveying system with an air flow of 2,240 actual cubic feet per minute;

(3) One (1) cyclone material separator to collect the product and to remove off spec fines and metal, identified as Material Separator 3 with one (1) set of bag filters for particulate control identified as G-3 bag filters, exhausting into the building.

(4) One (1) loadout drop point, identified as G-3 Product Drop

(d) G-4 Cumberland 1000 (Line 3), constructed in 2016, consisting of:

(1) One (1) Cumberland granulator, identified as G-4, with a maximum capacity of 2,000 pounds per hour;

(2) One (1) totally enclosed pneumatic conveying system with an air flow of 2,240 actual cubic feet per minute;

(3) One (1) cyclone material separator to collect the product and to remove off spec fines and metal, identified as Material Separator 4 with one (1) set of bag filters for particulate control identified as G-4 bag filters, exhausting into the building.

(4) One (1) loadout drop point, identified as G-4 Product Drop

(e) G-5 Cumberland 1000 (Line 5), constructed in 2016, consisting of:

(1) One (1) Cumberland granulator, identified as G-5, with a maximum capacity of 2,000 pounds per hour;

(2) One (1) totally enclosed pneumatic conveying system with an air flow of 2,240 actual cubic feet per minute with one (1) set of bag filters for particulate control identified as G-5 bag filters, exhausting into the building.

(3) One (1) cyclone material separator to collect the product and to remove off spec fines and metal, identified as Material Separator 5;

(4) One (1) loadout drop point, identified as G-5 Product Drop

(f) G-6 Cumberland 1400 (Line 4), constructed in 2016, consisting of:

(1) One (1) totally enclosed pneumatic conveying system with an air flow of 2,600 actual cubic feet per minute;

(2) One (1) cyclone material separator to collect the product and to remove off spec fines and metal, identified as Material Separator 6 with one (1) set of bag filters for particulate control identified as G-6 bag filters, exhausting into the building.

(3) One (1) loadout drop point, identified as G-6 Product Drop

(g) FS-1 (Line 6), constructed in 2016, consisting of:

(1) One (1) Float/Sink line, identified as FS-1, with a maximum capacity of 2,200 pounds per
(2) One (1) material drop point, identified as FS-1 Drop 1, with a maximum capacity of 2,200 pounds per hour;

(3) One (1) material drop point, identified as FS-1 Drop 2, with a maximum capacity of 2,200 pounds per hour;

(4) One (1) material drop point, identified as FS-1 Drop 3, with a maximum capacity of 2,200 pounds per hour;

(5) Two (2) cyclone material separators to collect the product and to remove off spec fines and metal, identified as Float/Sink Line Separator with two (2) sets of bag filters for particulate control identified as FS-1 bag filters #1 and FS-1 bag filters #2, exhausting into the building.

(h) Material Transfer Station (Line 9), constructed in 2017, consisting of:

(1) One (1) material transfer station, identified as Material Transfer Station Product Drop, with a maximum capacity of 2,200 pounds per hour;

(2) One (1) cyclone material separator to collect the product and to remove off spec fines and metal, identified as MTS Separator with one (1) set of bag filters for particulate control identified as MTS bag filters, exhausting into the building.

(i) Miscellaneous

(1) One (1) baler, identified as B-1;

(2) Three (3) SSI shredders, identified as S-1, S-2 and S-3.

(3) Paved roadways and parking lots with public access.

### Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit and operating rules.

### Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

### Description of Change

The Office of Air Quality (OAQ) has reviewed an application, submitted by Mervis Plastics Indianapolis on January 31, 2019, relating to adding a new float/sink line and a new elutriation system to the source. An unpermitted granulator is also being added to the permit.

The following is a list of the new emission units and pollution control device(s):

(a) FS-2 (Line 7), approved for construction in 2019, consisting of:

(1) One (1) Float/Sink line, identified as FS-2, with a maximum capacity of 2,200 pounds per hour, consisting of:

(2) One (1) Econogrind granulator, identified as G-7, with a maximum capacity of 2,200
pounds per hour;

(3) One (1) material drop point, identified as FS-2 Drop 1, with a maximum capacity of 2,200 pounds per hour;

(4) One (1) material drop point, identified as FS-2 Drop 2, with a maximum capacity of 2,200 pounds per hour;

(5) One (1) material drop point, identified as FS-2 Drop 3, with a maximum capacity of 2,200 pounds per hour;

(6) One (1) material transfer station, identified as Material Transfer Station Product Drop, with a maximum capacity of 2,200 pounds per hour;

(7) One (2) cyclone material separator to collect the product and to remove off spec fines and metal, identified as Float/Sink Line Separator, with two (2) sets of bag filters for particulate control identified as FS-2 bag filters, exhausting into the building.

(8) One (1) Natural-gas fired boiler, identified as Boiler-1, with a maximum heat input capacity of 0.4 MMBtu/hr, exhausting indoors

(b) E-1 Elutriation System (Line 11), approved for construction in 2019, consisting of:

(1) One (1) elutriator separator, identified as E-1, with a maximum capacity of 2,400 pounds per hour with one (1) set of bag filters for particulate control identified as E-1 bag filters, exhausting into the building.

(2) One (1) totally enclosed pneumatic conveying system with an air flow of 2,240 actual cubic feet per minute;

(3) Two (2) loadout drop point, identified as E-1 Product Drop; and

The following emission units that were constructed and/or operated without a permit:

(1) One (1) Cumberland granulator, constructed in 2018, identified as G-6, with a maximum capacity of 4,000 pounds per hour

| Permit Level Determination – MSOP |

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the proposed revision. If the control equipment has as been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.
### PTE Before Controls of the New Emission Units (ton/year)

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unpermitted Granulator 6 &amp; Separator (Line 4)</td>
<td>5.52</td>
<td>5.52</td>
<td>5.52</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td>Granulator 7 &amp; Separator (Line 7) + Product Drop</td>
<td>3.09</td>
<td>3.09</td>
<td>3.09</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td>Float/Sink Line &amp; Separators (FS-2, Line 7)+Product Drop</td>
<td>0.16</td>
<td>0.16</td>
<td>0.16</td>
<td>0.00</td>
<td>0.00</td>
<td>1.48</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Elutriation System (Planned) (Line 11)+Product Drop</td>
<td>3.43</td>
<td>3.43</td>
<td>3.43</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td></td>
</tr>
<tr>
<td><strong>Total PTE Before Controls of the New Emission Units:</strong></td>
<td><strong>12.19</strong></td>
<td><strong>12.19</strong></td>
<td><strong>12.19</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.00</strong></td>
<td><strong>1.48</strong></td>
<td><strong>0.00</strong></td>
<td></td>
</tr>
</tbody>
</table>

1PM$_{2.5}$ listed is direct PM$_{2.5}$.

Appendix A of this TSD reflects the detailed potential emissions of the proposed revision.

### Permit Level Determination – MSOP

This table reflects the unrestricted potential emissions of the source. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Unrestricted Source-Wide Emissions (ton/year)</th>
<th>PM$^1$</th>
<th>PM$_{10}$$^1$</th>
<th>PM$_{2.5}$$^{1, 2}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total PTE of Entire Source</strong></td>
<td>32.43</td>
<td>32.39</td>
<td>32.38</td>
<td>0.00</td>
<td>0.00</td>
<td>2.23</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>Title V Major Source Thresholds</strong></td>
<td>--</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>25</td>
</tr>
<tr>
<td><strong>MSOP Thresholds</strong></td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>25</td>
<td>100</td>
<td>25</td>
</tr>
</tbody>
</table>

1Under the Part 70 Permit program (40 CFR 70), PM$_{10}$ and PM$_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."
2PM$_{2.5}$ listed is direct PM$_{2.5}$.

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

(a) The potential to emit (as defined in 326 IAC 2-1.1-1) of PM10 and PM2.5 are each less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The potential to emit of all other criteria pollutants is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. The source will be issued an Minor Source Operating Permit (MSOP).

(b) The potential to emit (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7. The source will be issued an Minor Source Operating Permit (MSOP).
Federal Rule Applicability Determination

Federal rule applicability for this source has been reviewed as follows:

**New Source Performance Standards (NSPS):**

(a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for natural-gas boiler, because the maximum heat input capacity of the unit is less than 10 MMBtu/hr.

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

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

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers: Area Sources, 40 CFR 63, Subpart JJJJJJ are not included in the permit for Lochinvar Boiler (Boiler-1), since gas-fired boilers are exempt units to this rule, pursuant to 40 CFR 63.11195.

(d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the permit.

**Compliance Assurance Monitoring (CAM):**

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

State Rule Applicability - Entire Source

State rule applicability for this source has been reviewed as follows:

**326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))**

MSOP applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP section of this document.

**326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)**

PSD and Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the MSOP section of this document.

**326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**

The operation of this source will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

**326 IAC 2-6 (Emission Reporting)**

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, LaPorte, or Lawrenceburg Township, Dearborn County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

**326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
(1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4:

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
The source is subject to the requirements of 326 IAC 6-4, because the paved roads have the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
326 IAC 6.5 applies to sources or facilities located in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne Counties. Sources specifically listed in the rule shall comply with the limitations in 326 IAC 6.5-2 through 326 IAC 6.5-10, as applicable. Sources not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10 shall comply with 326 IAC 6.5-1-2, if they have the potential to emit ten (10) tons or more of particulate matter (PM) and are not taking a limit of less than ten (10) tons of particulate matter (PM).

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

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Marion County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

<table>
<thead>
<tr>
<th>State Rule Applicability – Individual Facilities</th>
</tr>
</thead>
</table>

State rule applicability for this source has been reviewed as follows:

Granulators and Material Separating Operations

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(c)(3), the granulators and material separating operations are not subject to the requirements of 326 IAC 6-3, since the source is subject to a more stringent particulate limitation in 326 IAC 6.5.

326 IAC 6.5 (PM Limitations Except Lake County)
As discussed in the State Rule Applicability - Entire Source, this source is subject to the requirements of 326 IAC 6.5. Pursuant to 326 IAC 6.5-1-2(a), PM emissions from the granulators and material processing and handling shall not exceed seven hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).
Float/Sink Lines (FS-1 and FS-2)

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, the float/sink lines were constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

Load Out Drop Points

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(c)(3), the load out drop points are not subject to the requirements of 326 IAC 6-3, since the source is subject to a more stringent particulate limitation in 326 IAC 6.5.

326 IAC 6.5 (PM Limitations Except Lake County)
As discussed in the State Rule Applicability - Entire Source, this source is subject to the requirements of 326 IAC 6.5. Pursuant to 326 IAC 6.5-1-2(a), PM emissions from the material processing and handling shall not exceed seven hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

Material Transfer Station

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(c)(3), the load out drop points are not subject to the requirements of 326 IAC 6-3, since the source is subject to a more stringent particulate limitation in 326 IAC 6.5.

326 IAC 6.5 (PM Limitations Except Lake County)
As discussed in the State Rule Applicability - Entire Source, this source is subject to the requirements of 326 IAC 6.5. Pursuant to 326 IAC 6.5-1-2(a), PM emissions from the material processing and handling shall not exceed seven hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

Lochinvar Boiler

326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)
The Lochinvar natural-gas boiler, identified as B-1, is not subject to the requirements of 326 IAC 6-2-4 since it is subject to a more stringent particulate limit established in 326 IAC 6.5.

326 IAC 6.5 (PM Limitations Except Lake County)
As discussed in the State Rule Applicability - Entire Source, this source is subject to the requirements of 326 IAC 6.5. Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter (PM) emissions from the boiler, identified as B-1, shall not exceed 0.01 grain per dry standard cubic foot (dscf) while combusting natural gas.

Compliance Determination and Monitoring Requirements

(a) The Compliance Monitoring Requirements applicable to this source are as follows:

<table>
<thead>
<tr>
<th>Control Device</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bag Filters (G-1 through G-7 and E-1)</td>
<td>Bag Filter Inspections</td>
<td>Quarterly</td>
<td>Verify that it is operated and maintained per manufacturer's specifications</td>
</tr>
<tr>
<td>Bag Filters (FS-1 and FS-2)</td>
<td>Bag Filter Inspections</td>
<td>Quarterly</td>
<td>Verify that it is operated and maintained per manufacturer's specifications</td>
</tr>
</tbody>
</table>
These monitoring conditions are necessary because the bag filters for the granulator/separation lines and Float/sink lines must operate properly to assure compliance with 326 IAC 6.5 (Particulate Emissions Limitations Except Lake County).

**Proposed Changes**

The following changes listed below are due to the proposed revision. Deleted language appears as strikethrough text and new language appears as bold text:

1. Added descriptions of new units and updated descriptions of existing units in sections A.2 and D.1 of the permit.

**Additional Changes**

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

1. For this MSOP, IDEM OAQ has included IDEM’s Master Agency Interest Identification (ID) number of 108768 in the permit cover page signature box.

<table>
<thead>
<tr>
<th>Operation Permit No.: M097-41000-00738</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Master Agency Interest ID:</strong> 108768</td>
</tr>
</tbody>
</table>

Issued by: Heath Hartley, Section Chief
Permits Branch
Office of Air Quality

<table>
<thead>
<tr>
<th>Issuance Date:</th>
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<tbody>
<tr>
<td>Expiration Date:</td>
</tr>
</tbody>
</table>

A.2 Emission Units and Pollution Control Equipment Summary

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

(f) G-6 Cumberland 1400 (Line 4), constructed in 2016, consisting of:

1. One (1) Cumberland granulator, identified as G-6, with a maximum capacity of 4,000 pounds per hour
2. One (1) totally enclosed pneumatic conveying system with an air flow of 2,600 actual cubic feet per minute;
3. One (1) cyclone material separator to collect the product and to remove off spec fines and metal, identified as Material Separator 6 with one (1) set of bag filters for particulate control identified as G-6 bag filters, exhausting into the building.
4. One (1) loadout drop point, identified as G-6 Product Drop

(h) FS-2 (Line 7), approved for construction in 2019, consisting of:

1. One (1) Float/Sink line, identified as FS-2, with a maximum capacity of 2,200 pounds per hour, consisting of:
(2) One (1) Econogrind granulator, identified as G-7, with a maximum capacity of 2,200 pounds per hour;

(3) One (1) material drop point, identified as FS-2 Drop 1, with a maximum capacity of 2,200 pounds per hour;

(4) One (1) material drop point, identified as FS-2 Drop 2, with a maximum capacity of 2,200 pounds per hour;

(5) One (1) material drop point, identified as FS-2 Drop 3, with a maximum capacity of 2,200 pounds per hour;

(6) One (2) cyclone material separator to collect the product and to remove off spec fines and metal, identified as Float/Sink Line Separator, with two (2) sets of bag filters for particulate control identified as FS-2 bag filters #1 and FS-2 bag filter #2, exhausting into the building.

(7) One (1) Natural-gas fired boiler, identified as Boiler-1, with a maximum heat input capacity of 0.4 MMBtu/hr, exhausting indoors.

(i) Material Transfer Station (Line 9), constructed in 2017, consisting of:

(1) One (1) material transfer station, identified as Material Transfer Station Product Drop, with a maximum capacity of 2,200 pounds per hour;

(2) One (1) cyclone material separator to collect the product and to remove off spec fines and metal, identified as MTS Separator with one (1) set of bag filters for particulate control identified as MTS bag filters, exhausting into the building.

(j) E-1 Elutriation System (Line 11), approved for construction in 2019, consisting of:

(1) One (1) elutriator separator, identified as E-1, with a maximum capacity of 2,400 pounds per hour with one (1) set of bag filters for particulate control identified as E-1 bag filters, exhausting into the building.

(2) One (1) totally enclosed pneumatic conveying system with an air flow of 2,240 actual cubic feet per minute;

(3) Two (2) loadout drop point, identified as E-1 Product Drop

---

**Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on January 31, 2019.

The operation of this source shall be subject to the conditions of the attached proposed New Source Review and MSOP No. 097-41000-00738. The staff recommends to the Commissioner that the New Source Review and MSOP be approved.
(a) If you have any questions regarding this permit, please contact Taylor Wade, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-0868 or (800) 451-6027, and ask for Taylor Wade or (317) 233-0868.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.
## TSD Appendix A: Emission Calculations

### Emissions Summary

**Source Name:** Mervis Plastics Indianapolis  
**Address City IN Zip:** 6550 E. 30th Street, Suite 151, Indianapolis, Indiana 46219  
**Permit Number:** M097-41000-00738  
**Reviewer:** Taylor Wade

### Uncontrolled Summary

#### Uncontrolled Potential to Emit (PTE)

<table>
<thead>
<tr>
<th>Process Description</th>
<th>PM (tons/yr)</th>
<th>PM10 (tons/yr)</th>
<th>PM2.5 (tons/yr)</th>
<th>SO2 (tons/yr)</th>
<th>NOx (tons/yr)</th>
<th>VOC (tons/yr)</th>
<th>CO (tons/yr)</th>
<th>Total HAPs (tons/yr)</th>
<th>Worst Single HAP (tons/yr)</th>
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</table>

**Total PTE (tons/yr):** 32.43 32.39 32.38 0.00 0.00 2.23 0.00 0.00

**Note:** The SSI shredder uses a low speed, high-torque, dual shearing technology designed to create "strips" that are the width of the cutters, usually 1" to 3" wide.

**Note:** The emissions from the Harris baler are expected to be negligible.
# TSD Appendix A: Emission Calculations

## Emissions Summary

**Source Name:** Mervis Plastics Indianapolis  
**Address City IN Zip:** 6550 E. 30th Street, Suite 151, Indianapolis, Indiana 46219  
**Permit Number:** M097-41000-00738  
**Reviewer:** Taylor Wade

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
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<tbody>
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<td>5.52</td>
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<tr>
<td>Granulator 7 &amp; Separator (Line 7)+Product Drop</td>
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<td>3.09</td>
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<td>Elutriation System (Planned) (Line 11)+Product Drop</td>
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<td>3.43</td>
<td>3.43</td>
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<td><strong>1.48</strong></td>
<td><strong>0.00</strong></td>
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</table>
The granulated waste material is pneumatically conveyed from the granulators to the material separators which use cyclonic action to separate fine material from the finished product material. This material is pneumatically conveyed to a bag filter collector for particulate control, which directly vents inside the building. Float/Sink Line 2 uses a drop tube to transfer from G-7 to F/S tank 2.

Assumed PM = PM10 = PM2.5

The emission factor for PM was used in a previous permit for Mervis Industries, Permit No. R167-41000-00738, for similar units/operations.
TSD Appendix A: Emission Calculations
Emission Unit/Operation: Float/Sink Lines
Type of Emissions: VOC Emissions
Source Name: Mervis Plastics Indianapolis
Address City IN Zip: 6550 E. 30th Street, Suite 151, Indianapolis, Indiana 46219
Permit Number: M097-41000-00738
Reviewer: Taylor Wade

<table>
<thead>
<tr>
<th>Density of Solution</th>
<th>Throughput of Solution (gal/yr)</th>
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### PTE

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<th>Unit ID</th>
<th>Number of Solution Tanks</th>
<th>VOCs (ton/yr)</th>
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<tr>
<td>Float/Sink Line &amp; Separators (FS-2, / Line 7)</td>
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<tr>
<td>Total PTE (tons/yr)</td>
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Methodology for PTE
Uncontrolled VOC Emissions (tons/yr): Density of Float/Sink Solution (lb/gal)* Throughput of Solution (gall/yr) / 2000 lb/ton

= 180 gallon/yr * 8.33 lb/gal * 0.99

**Note:** Assumes 100% of additives lost to evaporation per tank
TSD Appendix A: Emission Calculations

Emission Unit/Operation: Loadout Drop Points

Uncontrolled Emissions

Type of Emissions: Particulate Matter (PM) Emissions

Source Name: Mervis Plastics Indianapolis
Address City IN Zip: 6550 E. 30th Street, Suite 151, Indianapolis, Indiana 46219
Permit Number: M097-41000-00738
Reviewer: Taylor Wade

### Process Weight Rate

<table>
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<th>Maximum Throughput (lbs/hr)</th>
<th>Maximum Throughput (tons/hr)</th>
<th>Maximum Throughput (tons/yr)</th>
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</table>

**Total** 168,192

**Methodology for Throughputs**

Maximum Throughput (lbs/hr) = Maximum Throughput (tons/hr) / 2000 (lbs/ton)
Maximum Throughput (tons/yr) = Maximum Throughput (tons/hr) * 8760 (hrs/yr)

### Uncontrolled Criteria Pollutants Emissions

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>PM*</th>
<th>PM10*</th>
<th>PM2.5*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Granulator 1 Product Drop (Line 1B)</td>
<td>0.01</td>
<td>0.01</td>
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</tr>
<tr>
<td>Granulator 2 Product Drop (Line 1A)</td>
<td>0.01</td>
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<tr>
<td>Granulator 3 Product Drop (Line 2)</td>
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</tr>
<tr>
<td>Granulator 4 Product Drop (Line 3)</td>
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<td>Granulator 5 Product Drop (Line 5)</td>
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<td>Granulator 6 Product Drop (Line 4)</td>
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<td>Granulator 7 Product Drop (Line 7)</td>
<td>0.01</td>
<td>0.01</td>
<td>0.01</td>
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<tr>
<td>Float/Sink FS-1 Product Drop 1 (Line 6)</td>
<td>0.01</td>
<td>0.01</td>
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<td>Float/Sink FS-1 Product Drop 2 (Line 6)</td>
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<td>0.01</td>
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<tr>
<td>Float/Sink FS-2 Product Drop 1 (Line 7)</td>
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<td>Float/Sink FS-2 Product Drop 2 (Line 7)</td>
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<td>0.01</td>
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<tr>
<td>Float/Sink FS-2 Product Drop 3 (Line 7)</td>
<td>0.01</td>
<td>0.01</td>
<td>0.01</td>
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<td>Material Transfer Station Product Drop (Line 9)</td>
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<tr>
<td>Elutriation System Product Drop 1 (Line 11)</td>
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</tr>
<tr>
<td>Elutriation System Product Drop 2 (Line 11)</td>
<td>0.01</td>
<td>0.01</td>
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</tr>
</tbody>
</table>

**Total PTE (tons/yr)** 0.93 0.93 0.93

**Methodology for PTE**

PM, PM10 and PM2.5 Emissions (tons/yr) = Maximum Throughput (tons/yr) x Emission Factor (lb/ton) /2000 (lb/ton)

**Notes**

- Assume PM = PM10 = PM2.5
- Product Drop is a gravity fed process into holding containers
- No emission factors are available for granulated plastic transfer points. Comparative emission factors for PM (0.003 lb/ton) and PM10 (0.0011) can be found in AP-42 Chapter 11.19, Table 11.19.2-2 (SCC3-05-020-06) for Crushed Stone Processing and Pulverized Mineral Processing conveyor transfer points. The source has opted to use the higher emission factor of 0.01 lb/ton for PM for the loadout drop points from the material separators.

Line 8 is does not presently determined. Line 10 is a Harris baler and is not a significant source of emissions.
**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Company Name:** Mervis Plastics  Indianapolis  
**Source Address:** 6550 E. 30th Street, Suite 151, Indianapolis, Indiana 46219  
**Permit Number:** M097-41000-00738  
**Reviewer:** Taylor Wade

<table>
<thead>
<tr>
<th>Heat Input Capacity</th>
<th>HHV</th>
<th>Potential Throughput</th>
</tr>
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<tbody>
<tr>
<td>MMBtu/hr</td>
<td>mmBtu</td>
<td>MMCF/yr</td>
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<tr>
<td>0.4</td>
<td>1020</td>
<td>3.4</td>
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</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
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<tbody>
<tr>
<td>PM*</td>
<td>1.9</td>
<td>0.00</td>
</tr>
<tr>
<td>PM10*</td>
<td>7.6</td>
<td>0.01</td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>7.6</td>
<td>0.01</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.00</td>
</tr>
<tr>
<td>NOx</td>
<td>100</td>
<td>0.17</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>0.01</td>
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<tr>
<td>CO</td>
<td>84</td>
<td>0.14</td>
</tr>
</tbody>
</table>

**Methodology**

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

**Hazardous Air Pollutants (HAPs)**

<table>
<thead>
<tr>
<th>HAPs - Organics</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E-00</td>
<td>3.4E-03</td>
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<tr>
<td>Potential Emission in tons/yr</td>
<td>3.6E-06</td>
<td>2.1E-06</td>
<td>1.3E-04</td>
<td>0.00</td>
<td>5.8E-06</td>
<td>0.00</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>HAPs - Metals</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>8.6E-07</td>
<td>1.9E-06</td>
<td>2.4E-06</td>
<td>6.5E-07</td>
<td>3.6E-06</td>
<td>9.4E-06</td>
</tr>
</tbody>
</table>

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

#### Fugitive Dust Emissions - Paved Roads

**Source Name:** Mervis Plastics Indianapolis  
**Address City IN Zip:** 6550 E. 30th Street, Suite 151, Indianapolis, Indiana 46219  
**Permit Number:** M097-41000-00738  
**Reviewer:** Taylor Wade

---

#### Paved Roads at Industrial Site

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

**Vehicle Information (provided by source)**

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles per day</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight Loaded (tons/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (mi/trip)</th>
<th>Maximum one-way miles (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>HD Vehicles</td>
<td>9.0</td>
<td>2.0</td>
<td>18.0</td>
<td>32.0</td>
<td>576.0</td>
<td>375</td>
<td>0.071</td>
<td>1.3</td>
<td>466.6</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td></td>
<td></td>
<td>18.0</td>
<td></td>
<td>576.0</td>
<td></td>
<td>1.3</td>
<td>466.6</td>
<td></td>
</tr>
</tbody>
</table>

**Average Vehicle Weight Per Trip =** 32.0 tons/trip  
**Average Miles Per Trip =** 0.07 miles/trip

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

- \( PM \) \( PM_{10} \) \( PM_{2.5} \)
- \( W = 32.0 \quad 32.0 \quad 32.0 \) tons = average vehicle weight (provided by source)
- \( sL = 0.6 \quad 0.6 \quad 0.6 \) g/m^2 = Ubiquitous baseline silt loading value for paved public roads AP-42 Table 13.2.1-2

Taking natural mitigation due to precipitation into consideration, **Mitigated Emission Factor, \( E_{ext} \) =** \( Ef \ast [1 - (p/(4N))] \) (Equation 2 from AP-42 13.2.1)

- \( PM \) \( PM_{10} \) \( PM_{2.5} \)
- \( p = 125 \) days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
- \( N = 365 \) days per year

**Unmitigated Emission Factor, \( Ef \) =** \( 0.237 \quad 0.047 \quad 0.0116 \) lb/mile  
**Mitigated Emission Factor, \( E_{ext} \) =** \( 0.217 \quad 0.043 \quad 0.0106 \) lb/mile

---

#### Process

<table>
<thead>
<tr>
<th>Process</th>
<th>Unmitigated PTE of PM (tons/yr)</th>
<th>Unmitigated PTE of PM(_{10}) (tons/yr)</th>
<th>Unmitigated PTE of PM(_{2.5}) (tons/yr)</th>
<th>Mitigated PTE of PM (tons/yr)</th>
<th>Mitigated PTE of PM(_{10}) (tons/yr)</th>
<th>Mitigated PTE of PM(_{2.5}) (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>0.06</td>
<td>0.01</td>
<td>2.71E-03</td>
<td>0.05</td>
<td>0.01</td>
<td>2.48E-03</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td>0.06</td>
<td>0.01</td>
<td>2.71E-03</td>
<td>0.05</td>
<td>0.01</td>
<td>2.48E-03</td>
</tr>
</tbody>
</table>

**Methodology**

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

**Abbreviations**

- PM = Particulate Matter  
- PM\(_{10}\) = Particulate Matter (<10 um)  
- PM\(_{2.5}\) = Particle Matter (<2.5 um)  
- PTE = Potential to Emit
April 25, 2019

Rod Fye
Mervis Plastics Indianapolis
6550 E 30th St Ste 151
Indianapolis, IN 46219

Re: Public Notice
Mervis Plastics Indianapolis
Permit Level: MSOP w/NSR (120)
Permit Number: 097-41000-00738

Dear Rod Fye:

Enclosed is a copy of your draft MSOP w/NSR (120), Technical Support Document, emission calculations, and the Public Notice.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Indianapolis Marion County Public Library, 5420 East 38th Street in Indianapolis IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Taylor Wade, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-0868 or dial (317) 233-0868.

Sincerely,

Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 4/12/19
April 25, 2019

To: Indianapolis Marion County Public Library 5420 East 38th Street Indianapolis IN 46218

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

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

Applicant Name: Mervis Plastics Indianapolis
Permit Number: 097-41000-00738

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

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

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

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

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

Enclosures
PN Library updated 4/2019
Notice of Public Comment

April 25, 2019
Mervis Plastics Indianapolis
097-41000-00738

Dear Concerned Citizen(s):

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

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

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

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

Enclosure
PN AAA Cover Letter 4/12/2019
# Mail Code 61-53

**Name and address of Sender**

1. **Rod Fye**
   - Mervis Plastics Indianapolis
   - 6550 E 30th St Ste 151 Indianapolis IN 46219
   - (Source CAATS)

2. **Marion County Health Department**
   - 3838 N, Rural St Indianapolis IN 46205-2930
   - (Health Department)

3. **Indianapolis City Council and Mayors office**
   - 200 East Washington Street, Room E Indianapolis IN 46204
   - (Local Official)

4. **Carmel City Council and Mayors Office**
   - 1 Civic Square Carmel IN 46032
   - (Local Official)

5. **Marion County Commissioners**
   - 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204
   - (Local Official)

6. **Matt Mosier Office of Sustainability**
   - City-County Bldg/200 E Washington St. Rm# 2460 Indianapolis IN 46204
   - (Local Official)

7. **Indianapolis Marion County Public Library**
   - 5420 East 38th Street Indianapolis IN 46218
   - (Library)

8. **Johan & Susan Van Den Heuvel**
   - 4409 Blue Creek Drive Carmel IN 46033
   - (Affected Party)

9. **Indiana Members Credit Union**
   - 5103 Madison Avenue Indianapolis IN 46227
   - (Affected Party)

10. **DEEM**
    - 6900 E 30th Street Indianapolis IN 46219
    - (Affected Party)

11. **CSC**
    - 6831 E 32nd Street, Suite 100 Indianapolis IN 46219
    - (Affected Party)

12. **Venture Logistics**
    - 6831 E 32nd Street, Suite 400 Indianapolis IN 46219
    - (Affected Party)

13. **Glasrite**
    - 6790 E 32nd Street Indianapolis IN 46219
    - (Affected Party)

14. **A1TN**
    - 6515 Olivia Lane Indianapolis IN 46219
    - (Affected Party)

15. **Dynalow**
    - 6445 Olivia Lane Indianapolis IN 46219
    - (Affected Party)

**Total number of pieces Listed by Sender**

**Total number of Pieces Received at Post Office**

**Postmaster, Per (Name of Receiving employee)**

The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is $500. The maximum indemnity payable for registered mail, sent with optional postal insurance. See *Domestic Mail Manual* R900, S913, and S921 for limitations of coverage on insured and COD mail. See *International Mail Manual* for limitations on coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
Mail Code 61-53

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<td>IDEM Staff</td>
<td>Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204</td>
<td>CERTIFICATE OF MAILING ONLY</td>
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<td>1</td>
<td></td>
<td>Johnson Products 6434 32nd Court Indianapolis IN 46219 (Affected Party)</td>
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<td>Kenra, LTD 6575 E. 30th Street Indianapolis IN  46219  (Affected Party)</td>
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<td>7</td>
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<td>Ohio Valley Flooring 6535 E. 30th Street Indianapolis IN  46219  (Affected Party)</td>
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<td>Furguson Waterworks 6433 E 30th Street Indianapolis IN  46219  (Affected Party)</td>
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<td>Ryder 6701 E 30th Street Indianapolis IN  46219  (Affected Party)</td>
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<td>Enguard Security Solutions 6800 E 30th Street Indianapolis IN  46219  (Affected Party)</td>
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The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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<th>Line</th>
<th>Article Number</th>
<th>Name, Address, Street and Post Office Address</th>
<th>Postage</th>
<th>Handing Charges</th>
<th>Act. Value (If Registered)</th>
<th>Insured Value</th>
<th>Due Send if COD</th>
<th>R.R. Fee</th>
<th>S.D. Fee</th>
<th>S.H. Fee</th>
<th>Rest. Del. Fee</th>
<th>Remarks</th>
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<tbody>
<tr>
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<td></td>
<td>Mark Xenon Geosciences 52 W. Broadway St., P.O. BOX 681 Danville IN 46122 (Consultant)</td>
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<td>City of Indianapolis, Attn: General Council 200 East Washington Street Indianapolis IN 46204 (Affected Party)</td>
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**Mail Code 61-53**

**Name and address of Sender**  
Indiana Department of Environmental Management  
Office of Air Quality – Permits Branch  
100 N. Senate  
Indianapolis, IN 46204

**Type of Mail:**  
CERTIFICATE OF MAILING ONLY

**Remarks**

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