NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a Significant Revision to a Federally Enforceable State Operating Permit (FESOP) for Ilpea Industries, Inc. in Scott County

Significant Permit Revision No.: 143-41469-00018

The Indiana Department of Environmental Management (IDEM) has received an application from Ilpea Industries, Inc., located at 1320 S Main Street, Scottsburg, Indiana 47170, for a significant revision of its FESOP issued on August 5, 2013. If approved by IDEM’s Office of Air Quality (OAQ), this proposed revision would allow Ilpea Industries, Inc. to make certain changes at its existing source. Ilpea Industries, Inc. has applied to remove stack testing, change existing emission unit descriptions, change the pressure drop threshold for an existing wet scrubber, and add a dry scrubber with new compliance requirements.

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

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

Scott County Public Library
108 South Main Street
Scottsburg, IN 47170

and

IDEM Southeast Regional Office
820 West Sweet Street
Brownstown, IN 47220-9557

A copy of the preliminary findings is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](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/](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](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 SPR 143-41469-00018 in all correspondence.

**Comments should be sent to:**

Alexandrea Neuzerling  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Alexandrea Neuzerling or (317) 232-6634  
Or dial directly: (317) 232-6634  
Fax: (317) 232-6749 attn: Alexandrea Neuzerling  
E-mail: ANeuzerl@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](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](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, at the IDEM Regional Office 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 Alexandrea Neuzerling of my staff at the above address.

Iryn Caillung, Section Chief  
Permits Branch  
Office of Air Quality
New Source Review and Federally Enforceable State Operating Permit Renewal

OFFICE OF AIR QUALITY

Ilpea Industries Inc.
1320 S. Main Street
Scottsburg, Indiana 47170

(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.

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

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

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

SECTION A  SOURCE SUMMARY ......................................................................................................... 4
  A.1 General Information [326 IAC 2-8-3(b)]
  A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
  A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(l)]
  A.4 FESOP Applicability [326 IAC 2-8-2]

SECTION B  GENERAL CONDITIONS ................................................................................................... 9
  B.1 Definitions [326 IAC 2-8-1]
  B.2 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]
  B.3 Term of Conditions [326 IAC 2-1.1-9.5]
  B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]
  B.5 Severability [326 IAC 2-8-4(4)]
  B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
  B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]
  B.8 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]
  B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
  B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]
  B.11 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)]
  B.12 Emergency Provisions [326 IAC 2-8-12]
  B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]
  B.14 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]
  B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]
  B.16 Permit Renewal [326 IAC 2-8-3(h)]
  B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]
  B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]
  B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]
  B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]
  B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]
  B.23 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

SECTION C  SOURCE OPERATION CONDITIONS ............................................................................. 19
  Emission Limitations and Standards [326 IAC 2-8-4(1)] ................................................................ 19
    C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less
        Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]
    C.2 Overall Source Limit [326 IAC 2-8]
    C.3 Opacity [326 IAC 5-1]
    C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]
    C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
    C.6 Fugitive Dust Emissions [326 IAC 6-4]
    C.7 Stack Height [326 IAC 1-7]
    C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
    C.9 Performance Testing [326 IAC 3-6]
    C.10 Compliance Requirements [326 IAC 2-1.1-11]
    C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
    C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]
  Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)] ............................ 22
    C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
    C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
    C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
C.16  Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] ........................................ 24
C.17  General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
C.18  General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]

Stratospheric Ozone Protection ........................................................................................................ 25
C.19  Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1  EMISSIONS UNIT OPERATION CONDITIONS ........................................................................ 26

Emission Limitations and Standards [326 IAC 2-8-4(1)] .......................................................... 28
D.1.1  PM PSD Minor Limit [326 IAC 2-2]
D.1.2  Particulate Matter Less Than 10 Microns (PM10) and PM2.5 [326 IAC 2-2][326 IAC 2-8-4]
D.1.3  Particulate Matter (PM) [326 IAC 6-3-2]
D.1.4  Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements [326 IAC 2-8-4(1)] .................................................. 30
D.1.5  Particulate Control
D.1.6  Testing Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)] ...................... 32
D.1.7  Visible Emissions Notations
D.1.8  Parametric Monitoring
D.1.9  Broken or Failed Bag Detection
D.1.10 Scrubber Failure Detection

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] ........................................... 35
D.1.11 Record Keeping Requirements

SECTION D.2  EMISSIONS UNIT OPERATION CONDITIONS ........................................................................ 36

Emission Limitations and Standards [326 IAC 2-8-4(1)] .......................................................... 36
D.2.1  Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

CERTIFICATION .............................................................................................................................. 37

EMERGENCY OCCURRENCE REPORT .......................................................................................... 38

QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT ...................................... 40
SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary plastics and magnetic plastics manufacturing operation.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>1320 S. Main Street, Scottsburg, Indiana 47170</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>812-752-2526</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>3053 (Gaskets, Packaging and Sealing Devices)</td>
</tr>
<tr>
<td></td>
<td>3399 (Primary Metal Products, n.e.c.)</td>
</tr>
<tr>
<td>County Location:</td>
<td>Scott</td>
</tr>
<tr>
<td>Source Location Status:</td>
<td>Attainment for all criteria pollutants</td>
</tr>
<tr>
<td>Source Status:</td>
<td>Federally Enforceable State Operating Permit Program</td>
</tr>
<tr>
<td></td>
<td>Minor Source, under PSD and Emission Offset Rules</td>
</tr>
<tr>
<td></td>
<td>Not 1 of 28 Source Categories</td>
</tr>
</tbody>
</table>

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

The source consists of the following permitted emission units:

Plastic Pellet Process

The plastic pellet process blends PVC, filler and color and extrudes the mixture into plastic pellets.

(a) Storage Silos:

(1) Two (2) polyvinyl chloride (PVC) silos, constructed in 1999, and approved in 2014 for modification, identified as EU-106, and EU-107, each with a maximum capacity of 5,480 tons per year, each with bin vent filters, and exhausting outdoors; and

The maximum capacity was revised from 7,950 tons per year to 5,480 tons per year in 2014.

(2) One (1) calcium carbonate silo, constructed in 1999, identified as EU-108, with a maximum capacity of 7,950 tons per year with bin vent filters for control, and exhausting outdoors.

The PVC and calcium carbonate material is vacuumed from a rail car, equipped with a bin vent filter, to a silo and then vacuum fed into blenders. The process time in the blenders limits the production of plastic and the amount of calcium carbonate and PVC that can be used.

(b) One (1) Ferrite Banbury mixer, constructed in 1999, modified in 2016 to exhaust outdoors, identified as EU-122, with a maximum capacity of 3,700 lbs per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122.
(c) One (1) plastic pellet production line, approved in 2016 for construction, identified as EU-112, with a maximum capacity of 3,500 pounds per hour, uncontrolled, and exhausting to wall vent 112.

(d) One (1) plastic pellet production line, constructed in 1999, identified as EU-113, with a maximum capacity of 700 pounds per hour, no control and exhausting to stack S-113.

(e) One (1) plastic pellet production line, constructed in 1999, identified as EU-115, with a maximum capacity of 1,200 pounds per hour, no control and exhausting indoors.

(f) One (1) plastic pellet production line, constructed in 1999, identified as EU-116, with a maximum capacity of 1,200 pounds per hour, no control and exhausting to stack S-116.

(g) One (1) plastic pellet production line, constructed in 1999, identified as EU-117, with a maximum capacity of 1,500 pounds per hour, no control and exhausting indoors.

(h) One (1) plastic pellet production line, constructed in 1999, identified as EU-118, with a maximum capacity of 1,500 pounds per hour, no control and exhausting indoors.

Powder Metal Process

(i) Iron oxide unloading to Silo 1, identified as EU-103, constructed in 2014, approved in 2018 for modification, with a maximum capacity of 25,000 pounds per hour and a bottlenecked capacity of 96,000 pounds per day, using baghouse C-156 as control and exhausting to stack S-156.

(j) Iron oxide unloading to Silo 2, identified as EU-105, constructed in 2014, approved in 2018 for modification, with a maximum capacity of 25,000 pounds per hour and a bottlenecked capacity of 96,000 pounds per day, using baghouse C-157 as control and exhausting to stack S-157.

(k) One (1) weigh hopper, identified as EU-156, constructed in 2014, modified in 2015, approved in 2018 for modification, with a maximum capacity of 8,000 pounds per hour and a bottlenecked capacity of 48,000 pounds per day, using baghouse C-156 as control and exhausting to stack S-156.

(l) One (1) weigh hopper, identified as EU-157, approved in 2013 for construction, approved in 2015 for modification, approved in 2018 for modification, with a maximum capacity of 8,000 pounds per hour and a bottlenecked capacity of 48,000 pounds per day, using baghouse C-156 as control and exhausting to stack S-156.

(m) One (1) Cibec Mixer, constructed in 2014, modified in 2015 to remove a baghouse and correct the maximum capacity, and approved in 2016 for modification to increase the maximum number of batches per day, identified as EU-123C, with a maximum capacity of 8,000 pounds of iron oxide and 1,427 lbs of strontium carbonate, six (6) batches per day, using no control, and exhausting indoors.

(n) One (1) Cibec Mixer, approved in 2014 for construction, approved in 2015 for modification to remove a baghouse and correct the maximum capacity, and approved in 2016 for modification to increase the maximum number of batches per day, identified as EU-125, with a maximum capacity of 8,000 pounds of iron oxide and 1,427 lbs of strontium carbonate per batch, six (6) batches per day, using no control, and exhausting indoors.
(o) One (1) Strontium weigh hopper (#1), constructed in 2014, identified as EU-158, with a maximum capacity of 870 pounds of Strontium Carbonate per hour, using a baghouse for control, identified as C-158, and exhausting indoors.

(p) One (1) Strontium weigh hopper (#2), identified as EU-159, with a maximum capacity of 870 pounds of Strontium Carbonate per hour, using a baghouse for control, identified as C-159, and exhausting indoors.

This hopper was originally approved in 2014 for construction; it was approved for construction extension in 2016 and again in 2019.

(q) One (1) Small rotary calcining kiln, constructed in 2014, identified as EU-101, approved in 2019 to change control, with a maximum capacity of 3,000 lbs of iron oxide mixture solids per hour and a maximum heat input capacity of 10.00 MMBtu/hr, using a wet scrubber (identified as C-101-2) as control until a new dry scrubber (identified as DS-101) is constructed, at which time wet scrubber C-101-2 will be removed, and exhausting to stack S-101-2.

(r) One (1) Large rotary calcining kiln, constructed in 2016, identified as EU-102, approved in 2019 to change control, with a maximum capacity of 3,500 lbs of iron oxide mixture solids per hour and a maximum heat input capacity of 10.00 MMBtu/hr, using a wet scrubber (identified as C-101-2) as control until a new dry scrubber (identified as DS-101) is constructed, at which time wet scrubber C-101-2 will be removed, and exhausting to stack S-101-2.

Iron Oxide (from silos) and Strontium Carbonate (bags) are fed into the kilns and heated to form iron clinkers. The clinkers are milled from large particle size to a very fine powder which is used to make magnetic plastic. The milled material is sent to the Banbury mixer so plastic material can be added to form a compound and extruded to form magnetic plastic strips and rolls for plastic magnets.

(s) One (1) Moritz Mill (#1), constructed in 2014, modified in 2017 to exhaust outdoors, identified as EU-152, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-152, and exhausting to stack S123.

(t) One (1) Moritz Mill (#2), constructed in 2014, modified in 2017 to exhaust outdoors, identified as EU-153, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-153, and exhausting to stack S124.

(u) One (1) Moritz Mill (#3), identified as EU-154, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-154, and exhausting to stack S125.

The above unit was originally approved in 2013 for construction. The maximum capacity was revised from 2,380 lbs per hour to 1,700 lbs per hour in 2014. It was then approved for construction extension in 2016 and again in 2019.

(v) One (1) Ferrite twin ICMA banbury/extruder/mixer line, constructed in 2013, approved in 2016 to correct the maximum capacity, approved in 2017 for modification to increase the maximum capacity, identified as EU-123B, with a maximum capacity of 4,400 pounds per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122, and consisting of the following:

(1) One (1) 275- liter capacity mixer, and

(2) Two (2) twin banbury extruders/mixers
The banbury mixes powder metal and plastic together to form a magnetic compound. Ingredients used are chlorinated polyethylene, ethylene vinyl acetate, stearic acid, propylene based elastomer and epoxidized soybean oil.

The baghouse C-122 is a common control device used for twin banbury/extruder/mixer line EU-123B and Banbury Mixer EU-122.

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

The source also consists of the following insignificant activities:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(1) One (1) natural gas-fired air make-up unit, constructed in 1999, identified as EU-119, with a maximum heat input of 1.1 MMBtu per hour, exhausting to stack S-119.

(2) Four (4) natural gas-fired space heaters, constructed in 1999, identified as EU-136, EU-141, EU-142, and EU-143, with a maximum heat input of 0.14 MMBtu per hour each, exhausting to stacks S-136, S-141, S-142, and S-143.

(3) Eight (8) natural gas-fired space heaters, constructed in 1999, identified as EU-137, EU-138, EU-139, EU-140, EU-144, EU-145, EU-146, and EU-147, with a maximum heat input of 0.25 MMBtu per hour each, exhausting to stacks S-137, S-138, S-139, S-140, S-144, S-145, S-146, and S-147.

(4) Two (2) natural gas-fired space heaters, constructed in 1999, identified as EU-148 and EU-149, with a maximum heat input of 0.40 MMBtu per hour each, exhausting to stacks S-148 and S-149.

(5) One (1) natural gas-fired Cleaver Brooks boiler, constructed in 1999, identified as EU-151, with a maximum heat input of 2.5 MMBtu per hour, exhausting to stack S-151.

(6) Four (4) natural gas-fired space heaters, installed in 2014, identified as EU-170, EU-171, EU-172, EU-173, with a maximum heat input of 0.4 MMBtu per hour each.

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: cutting torches, soldering equipment, and welding equipment.

(c) Repair activities, including the following: Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(d) Conveyors as follows: enclosed systems for conveying plastic raw materials and plastic finished goods.

(e) Routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process, including the following: purging of gas lines, purging of vessels.

(f) Blowdown for a cooling tower.

(g) Emissions from a laboratory as defined in 326 IAC 2-7-1(21)(D).
(l) Emissions from research and development activities as defined in 326 IAC 2-7-1(21)(D).

(h) Waste water pre-treatment system, with an oil and grease content less than one percent (1) by volume.

(i) Eleven (11) magnetic extrusion lines, each with a throughput of 450 lbs per hour, no control, and exhausting indoors.

(j) One (1) plastic extrusion line, with a throughput of 400 lbs per hour, no control, and exhausting indoors.

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

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

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

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

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

(a) This permit, F143-32451-00018, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

B.4 Enforceability [326 IAC 2-8-6][IC 13-17-12]

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 [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

1. it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
2. the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

### B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

(c) The annual compliance certification report shall include the following:

1. The appropriate identification of each term or condition of this permit that is the basis of the certification;
2. The compliance status;
3. Whether compliance was continuous or intermittent;
4. The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
5. Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The
PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Southwest Regional Office and Southeast Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304,
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

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

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

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

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

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F143-32451-00018 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.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]
The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]
(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.
(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]
(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
Request for renewal shall be submitted to:

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

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

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

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

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

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

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:
Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

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;

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;

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

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

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

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

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

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.
B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

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

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO2 equivalent emissions (CO2e) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

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

C.3 Opacity  [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

(g) Indiana Licensed Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.
Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]
The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4][326 IAC 2-8-5(a)]

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

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

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]
Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

1. initial inspection and evaluation;

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

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

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

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The date's analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

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

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

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:
Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

**Stratospheric Ozone Protection**

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plastic Pellet Process
  The plastic pellet process blends PVC, filler and color and extrudes the mixture into plastic pellets.

(a) Storage Silos:
(1) Two (2) polyvinyl chloride (PVC) silos, constructed in 1999, and approved in 2014 for modification, identified as EU-106, and EU-107, each with a maximum capacity of 5,480 tons per year, each with bin vent filters, and exhausting outdoors; and
  The maximum capacity was revised from 7,950 tons per year to 5,480 tons per year in 2014.
(2) One (1) calcium carbonate silo, constructed in 1999, identified as EU-108, with a maximum capacity of 7,950 tons per year with bin vent filters for control, and exhausting outdoors.
  The PVC and calcium carbonate material is vacuumed from a rail car, equipped with a bin vent filter, to a silo and then vacuum fed into blenders. The process time in the blenders limits the production of plastic and the amount of calcium carbonate and PVC that can be used.

(b) One (1) Ferrite Banbury mixer, constructed in 1999, modified in 2016 to exhaust outdoors, identified as EU-122, with a maximum capacity of 3,700 lbs per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122.

(c) One (1) plastic pellet production line, approved in 2016 for construction, identified as EU-112, with a maximum capacity of 3,500 pounds per hour, uncontrolled, and exhausting to wall vent 112.

(d) One (1) plastic pellet production line, constructed in 1999, identified as EU-113, with a maximum capacity of 700 pounds per hour, no control and exhausting to stack S-113.

(e) One (1) plastic pellet production line, constructed in 1999, identified as EU-115, with a maximum capacity of 1,200 pounds per hour, no control and exhausting indoors.

(f) One (1) plastic pellet production line, constructed in 1999, identified as EU-116, with a maximum capacity of 1,200 pounds per hour, no control and exhausting to stack S-116.

(g) One (1) plastic pellet production line, constructed in 1999, identified as EU-117, with a maximum capacity of 1,500 pounds per hour, no control and exhausting indoors.

(h) One (1) plastic pellet production line, constructed in 1999, identified as EU-118, with a maximum capacity of 1,500 pounds per hour, no control and exhausting indoors.

Powder Metal Process

(i) Iron oxide unloading to Silo 1, identified as EU-103, constructed in 2014, approved in 2018 for modification, with a maximum capacity of 25,000 pounds per hour and a bottlenecked capacity of 96,000 pounds per day, using baghouse C-156 as control and exhausting to stack S-156.
Iron oxide unloading to Silo 2, identified as EU-105, constructed in 2014, approved in 2018 for modification, with a maximum capacity of 25,000 pounds per hour and a bottlenecked capacity of 96,000 pounds per day, using baghouse C-157 as control and exhausting to stack S-157.

One (1) weigh hopper, identified as EU-156, constructed in 2014, modified in 2015, approved in 2018 for modification, with a maximum capacity of 8,000 pounds per hour and a bottlenecked capacity of 48,000 pounds per day, using baghouse C-156 as control and exhausting to stack S-156.

One (1) weigh hopper, identified as EU-157, approved in 2013 for construction, approved in 2015 for modification, approved in 2018 for modification, with a maximum capacity of 8,000 pounds per hour and a bottlenecked capacity of 48,000 pounds per day, using baghouse C-156 as control and exhausting to stack S-156.

One (1) Cibec Mixer, constructed in 2014, modified in 2015 to remove a baghouse and correct the maximum capacity, and approved in 2016 for modification to increase the maximum number of batches per day, identified as EU-123C, with a maximum capacity of 8,000 pounds of iron oxide and 1,427 lbs of strontium carbonate, six (6) batches per day, using no control, and exhausting indoors.

One (1) Cibec Mixer, approved in 2014 for construction, approved in 2015 for modification to remove a baghouse and correct the maximum capacity, and approved in 2016 for modification to increase the maximum number of batches per day, identified as EU-125, with a maximum capacity of 8,000 pounds of iron oxide and 1,427 lbs of strontium carbonate per batch, six (6) batches per day, using no control, and exhausting indoors.

One (1) Strontium weigh hopper (#1), constructed in 2014, identified as EU-158, with a maximum capacity of 870 pounds of Strontium Carbonate per hour, using a baghouse for control, identified as C-158, and exhausting indoors.

One (1) Strontium weigh hopper (#2), identified as EU-159, with a maximum capacity of 870 pounds of Strontium Carbonate per hour, using a baghouse for control, identified as C-159, and exhausting indoors.

This hopper was originally approved in 2014 for construction; it was approved for construction extension in 2016 and again in 2019.

One (1) Small rotary calcining kiln, constructed in 2014, identified as EU-101, approved in 2019 to change control, with a maximum capacity of 3,000 lbs of iron oxide mixture solids per hour and a maximum heat input capacity of 10.00 MMBtu/hr, using a wet scrubber (identified as C-101-2) as control until a new dry scrubber (identified as DS-101) is constructed, at which time wet scrubber C-101-2 will be removed, and exhausting to stack S-101-2.

One (1) Large rotary calcining kiln, constructed in 2016, identified as EU-102, approved in 2019 to change control, with a maximum capacity of 3,500 lbs of iron oxide mixture solids per hour and a maximum heat input capacity of 10.00 MMBtu/hr, using a wet scrubber (identified as C-101-2) as control until a new dry scrubber (identified as DS-101) is constructed, at which time wet scrubber C-101-2 will be removed, and exhausting to stack S-101-2.

Iron Oxide (from silos) and Strontium Carbonate (bags) are fed into the kilns and heated to form iron clinkers. The clinkers are milled from large particle size to a very fine powder which is used to make magnetic plastic. The milled material is sent to the Banbury mixer so plastic material can be added to form a compound and extruded to form magnetic plastic strips and rolls for plastic magnets.
(s) One (1) Moritz Mill (#1), constructed in 2014, modified in 2017 to exhaust outdoors, identified as EU-152, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-152, and exhausting to stack S123.

(t) One (1) Moritz Mill (#2), constructed in 2014, modified in 2017 to exhaust outdoors, identified as EU-153, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-153, and exhausting to stack S124.

(u) One (1) Moritz Mill (#3), identified as EU-154, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-154, and exhausting to stack S125.

The above unit was originally approved in 2013 for construction. The maximum capacity was revised from 2,380 lbs per hour to 1,700 lbs per hour in 2014. It was then approved for construction extension in 2016 and again in 2019.

(v) One (1) Ferrite twin ICMA banbury/extruder/mixer line, constructed in 2013, approved in 2016 to correct the maximum capacity, approved in 2017 for modification to increase the maximum capacity, identified as EU-123B, with a maximum capacity of 4,400 pounds per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122, and consisting of the following:

1. One (1) 275- liter capacity mixer, and
2. Two (2) twin banbury extruders/mixers

The banbury mixes powder metal and plastic together to form a magnetic compound. Ingredients used are chlorinated polyethylene, ethylene vinyl acetate, stearic acid, propylene based elastomer and epoxidized soybean oil.

The baghouse C-122 is a common control device used for twin banbury/extruder/mixer line EU-123B and Banbury Mixer EU-122.

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

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

#### D.1.1 PM PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

(a) The PM emissions after control from each unit listed in the table below shall not exceed the values shown:

<table>
<thead>
<tr>
<th>Control Device</th>
<th>Emission Units</th>
<th>PM Limitations (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>C-101-2 (exhausting to S101-2) or DS-101 (exhausting to S101-2)</td>
<td>Powder metal calcining process (klin EU-101 and/or EU-102)</td>
<td>11.35</td>
</tr>
<tr>
<td>C-152 (exhausting Stack S123)</td>
<td>Moritz Mill (EU-152)</td>
<td>3.68</td>
</tr>
<tr>
<td>C-153 (exhausting Stack S124)</td>
<td>Moritz Mill (EU-153)</td>
<td>3.68</td>
</tr>
<tr>
<td>C-154 (exhausting Stack S125)</td>
<td>Moritz Mill (EU-154)</td>
<td>3.68</td>
</tr>
<tr>
<td>C-156 (exhausting Stack S-156)</td>
<td>Iron Oxide Silo (EU-103), Weigh Hopper EU-156, Weigh Hopper EU-157</td>
<td>1.19</td>
</tr>
<tr>
<td>C-157 (exhausting Stack S-157)</td>
<td>Iron Oxide Silo (EU-105)</td>
<td>1.19</td>
</tr>
<tr>
<td>C-158 (exhausting indoors)</td>
<td>Weigh Hopper (EU158)</td>
<td>4.30</td>
</tr>
<tr>
<td>C-159 (exhausting indoors)</td>
<td>Weigh Hopper ( EU-159)</td>
<td>4.30</td>
</tr>
<tr>
<td>C-122 (Stack S-122)</td>
<td>Banbury Mixer (EU-122)</td>
<td>1.05</td>
</tr>
<tr>
<td></td>
<td>Twin Banbury/Extruder/Mixer Line (EU-123B)</td>
<td></td>
</tr>
</tbody>
</table>
(b) The Permittee shall operate only one (1) kiln (EU-101 or EU-102) at a time, until the dry scrubber (DS-101) begins operation, at which time both kilns may run simultaneously or separately.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Particulate Matter Less Than 10 Microns (PM10) and PM2.5 [326 IAC 2-2-4][326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

(a) The PM10 and PM2.5 emissions after control from each unit listed in the table below shall not exceed the values shown:

<table>
<thead>
<tr>
<th>Control Device</th>
<th>Emission Units</th>
<th>PM10 Limitations (lb/hr)</th>
<th>PM2.5 Limitations (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>C-101-2 (exhausting to S101-2) or DS-101 (exhausting to S101-2)</td>
<td>Powder metal calcining process (klin EU-101 and/or EU-102)</td>
<td>2.06</td>
<td>2.06</td>
</tr>
<tr>
<td>C-152 (exhausting Stack S123)</td>
<td>Moritz Mill (EU-152)</td>
<td>3.68</td>
<td>3.68</td>
</tr>
<tr>
<td>C-153 (exhausting Stack S124)</td>
<td>Moritz Mill (EU-153)</td>
<td>3.68</td>
<td>3.68</td>
</tr>
<tr>
<td>C-154 (exhausting Stack S125)</td>
<td>Moritz Mill (EU-154)</td>
<td>3.68</td>
<td>3.68</td>
</tr>
<tr>
<td>C-156 (exhausting Stack S-156)</td>
<td>Iron Oxide Silo (EU-103), Weigh Hopper EU-156, Weigh Hopper EU-157</td>
<td>1.19</td>
<td>1.19</td>
</tr>
<tr>
<td>C-157 (exhausting Stack S-157)</td>
<td>Iron Oxide Silo (EU-105)</td>
<td>1.19</td>
<td>1.19</td>
</tr>
<tr>
<td>C-158 (exhausting indoors)</td>
<td>Weigh Hopper (EU158)</td>
<td>1.55</td>
<td>1.55</td>
</tr>
<tr>
<td>C-159 (exhausting indoors)</td>
<td>Weigh Hopper (EU-159)</td>
<td>1.55</td>
<td>1.55</td>
</tr>
<tr>
<td>C-122 (Stack S-122)</td>
<td>Twin Banbury/Extruder/Mixer Line (EU-123B)</td>
<td>1.05</td>
<td>1.05</td>
</tr>
</tbody>
</table>

(b) The Permittee shall operate only one (1) kiln (EU-101 or EU-102) at a time, until the dry scrubber (DS-101) begins operation, at which time both kilns may run simultaneously or separately.

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

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from each unit shall not exceed the following:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Process Weight Rate (tons/hr)</th>
<th>PM Limitations (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rotary Calcining Kiln (EU-101)</td>
<td>1.5</td>
<td>5.38</td>
</tr>
<tr>
<td>Rotary Calcining Kiln (EU-102)</td>
<td>1.75</td>
<td>5.97</td>
</tr>
<tr>
<td>Moritz Mill (EU-152)</td>
<td>0.85</td>
<td>3.68</td>
</tr>
<tr>
<td>Moritz Mill (EU-153)</td>
<td>0.85</td>
<td>3.68</td>
</tr>
<tr>
<td>Emission Unit</td>
<td>Process Weight Rate (tons/hr)</td>
<td>PM Limitations (lb/hr)</td>
</tr>
<tr>
<td>--------------</td>
<td>-------------------------------</td>
<td>------------------------</td>
</tr>
<tr>
<td>Moritz Mill (EU-154)</td>
<td>0.85</td>
<td>3.68</td>
</tr>
<tr>
<td>Weigh Hopper (EU-156)</td>
<td>0.83</td>
<td>3.63</td>
</tr>
<tr>
<td>Weigh Hopper (EU-157)</td>
<td>0.83</td>
<td>3.63</td>
</tr>
<tr>
<td>Weigh Hopper (EU-158)</td>
<td>0.44</td>
<td>2.35</td>
</tr>
<tr>
<td>Cibec Mixer (EU123C)</td>
<td>1.59</td>
<td>5.59</td>
</tr>
<tr>
<td>Weigh Hopper (EU-159)</td>
<td>0.44</td>
<td>2.35</td>
</tr>
<tr>
<td>Cibec Mixer (EU125)</td>
<td>1.59</td>
<td>5.59</td>
</tr>
<tr>
<td>Banbury Mixer (EU-122)</td>
<td>1.85</td>
<td>6.19</td>
</tr>
<tr>
<td>Twin Banbury/Extruder/ Mixer Line (EU-123B)</td>
<td>2.20</td>
<td>6.95</td>
</tr>
<tr>
<td>Iron Oxide Silo (EU-103)</td>
<td>0.83</td>
<td>3.63</td>
</tr>
<tr>
<td>Iron Oxide Silo (EU-105)</td>
<td>0.83</td>
<td>3.63</td>
</tr>
</tbody>
</table>

These pounds per hour limitations were calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

\[ E = 4.10 \ P^{0.67} \]

where \( E \) = rate of emission in pounds per hour and \( P \) = process weight rate in tons per hour.

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

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

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.5 Particulate Control

(a) In order to comply with Conditions D.1.1, D.1.2, and D.1.3, either the wet scrubber, C-101-2, or the dry scrubber, DS-101, for particulate control shall be in operation and control emissions from the rotary calcining kilns, identified as EU-101 and EU-102, at all times that the associated kiln(s) is/are in operation.

(b) In order to comply with Conditions D.1.1, D.1.2, and D.1.3, the baghouses for particulate control shall be in operation and control emissions from the following:

<table>
<thead>
<tr>
<th>Baghouse</th>
<th>Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>C-152 (exhausting Stack S123)</td>
<td>Moritz Mill (EU-152)</td>
</tr>
<tr>
<td>C-153 (exhausting Stack S124)</td>
<td>Moritz Mill (EU-153)</td>
</tr>
<tr>
<td>C-154 (exhausting Stack S125)</td>
<td>Moritz Mill (EU-154)</td>
</tr>
<tr>
<td>C-156 (exhausting Stack S-156)</td>
<td>Iron Oxide Silo (EU-103), Weigh Hopper EU-156, Weigh Hopper EU-157</td>
</tr>
<tr>
<td>C-157 (exhausting Stack S-157)</td>
<td>Iron Oxide Silo (EU-105)</td>
</tr>
<tr>
<td>C-158 (exhausting indoors)</td>
<td>Weigh Hopper (EU158)</td>
</tr>
<tr>
<td>C-159 (exhausting indoors)</td>
<td>Weigh Hopper (EU-159)</td>
</tr>
<tr>
<td>C-122 (Stack S-122)</td>
<td>Twin Banbury/Extruder/Mixer Line (EU-123B)</td>
</tr>
</tbody>
</table>

at all times that these units are in operation.

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

D.1.6 Testing Requirements [326 IAC 2-1.1-11]

(a) In order to demonstrate the compliance status with Conditions D.1.1, D.1.2, and D.1.3, not later than one hundred and eighty (180) days after initial startup of the Twin Banbury/Extruder/Mixer Line (EU-123B), the Permittee shall conduct PM, PM10, and PM2.5 testing for the Banbury Mixer (EU-122) and Twin Banbury/Extruder/Mixer Line (EU-123B), utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid demonstration.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee’s obligations with regard to the performance testing required by this condition.

PM10 and PM2.5 includes filterable and condensable PM.

Baghouse C-122 is a common control device used for twin banbury/extruder/mixer line EU-123B and Banbury Mixer EU-122.

(b) In order to demonstrate the compliance status with Conditions D.1.1, D.1.2, and D.1.3,

(i) The Permittee shall conduct PM, PM10, and PM2.5 testing for each of the two rotary calcining kilns (EU-101 and EU-102) after its control (wet scrubber), utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

(ii) No later than one hundred and eighty (180) days after initial startup of the dry scrubber (DS-101), the Permittee shall conduct PM, PM10, and PM2.5 testing for each of the two rotary calcining kilns (EU-101 and EU-102) after its control (dry scrubber), utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

(iii) The Permittee shall conduct the PM, PM10, and PM2.5 testing specified in either Condition D.1.6(b)(i) or Condition D.1.6(b)(ii), whichever occurs first.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee’s obligations with regard to the performance testing required by this condition.

PM10 and PM2.5 includes filterable and condensable PM.

(c) In order to demonstrate the compliance status with Conditions D.1.1, D.1.2, and D.1.3, not later than one hundred and eighty (180) days after initial startup of the following, the Permittee shall conduct PM, PM10, and PM2.5 testing:

<table>
<thead>
<tr>
<th>Baghouse Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>C-122 (Stack S-122)</td>
</tr>
<tr>
<td>Banbury Mixer (EU-122)</td>
</tr>
<tr>
<td>Twin Banbury/Extruder/Mixer Line (EU-123B)</td>
</tr>
</tbody>
</table>
utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligations with regard to the performance testing required by this condition.

PM10 and PM2.5 includes filterable and condensable PM.

(d) In order to demonstrate the compliance status with Conditions D.1.1, D.1.2, and D.1.3, not later than one hundred and eighty (180) days after initial startup of the new baghouses with the Moritz Mills, the Permittee shall conduct PM, PM10, and PM2.5 testing:

<table>
<thead>
<tr>
<th>Baghouse</th>
<th>Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>C-152 (exhausting Stack S123)</td>
<td>Moritz Mill (EU-152)</td>
</tr>
<tr>
<td>C-153 (exhausting Stack S124)</td>
<td>Moritz Mill (EU-153)</td>
</tr>
<tr>
<td>C-154 (exhausting Stack S125)</td>
<td>Moritz Mill (EU-154)</td>
</tr>
</tbody>
</table>

utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

If in case the existing baghouses are not replaced with these new baghouses, tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration of the existing baghouses.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligations with regard to the performance testing required by this condition.

PM10 and PM2.5 includes filterable and condensable PM.

(e) In order to assure compliance with Conditions D.1.1, D.1.2, and D.1.3, not later than 180 days after the issuance date of this permit, Permit No 143-40532-00018 or 180 days after the commencement of operation of the revised configuration of baghouse C-156, whichever is later, the Permittee shall perform PM, PM10, and PM2.5 testing of the baghouse C-156 utilizing methods approved by the commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

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

D.1.7 Visible Emissions Notations

(a) Visible emission notations of the Rotary Kilns, Banbury Mixer and Twin Banbury/Extruder/Mixer, and iron oxide unloading to Silo 2 stack exhausts (S-101-2, S-122, and S-157) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reporting required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.8 Parametric Monitoring

(a) The Permittee shall record the pressure drop across the baghouses used in conjunction with the following:

<table>
<thead>
<tr>
<th>Baghouse</th>
<th>Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>C-152 (exhausting Stack S123)</td>
<td>Moritz Mill (EU-152)</td>
</tr>
<tr>
<td>C-153 (exhausting Stack S124)</td>
<td>Moritz Mill (EU-153)</td>
</tr>
<tr>
<td>C-154 (exhausting Stack S125)</td>
<td>Moritz Mill (EU-154)</td>
</tr>
<tr>
<td>C-156 (exhausting Stack S-156)</td>
<td>Iron Oxide Silo (EU-103)</td>
</tr>
<tr>
<td>C-158 (exhausting indoors)</td>
<td>Weigh Hopper (EU158)</td>
</tr>
<tr>
<td>C-159 (exhausting indoors)</td>
<td>Weigh Hopper (EU-159)</td>
</tr>
<tr>
<td>C-122 (Stack S-122)</td>
<td>Banbury Mixer (EU-122)</td>
</tr>
<tr>
<td></td>
<td>Twin Banbury/Extruder/Mixer Line (EU-123B)</td>
</tr>
</tbody>
</table>

at least once per day when the process is in operation. When, for any one reading, the pressure drop across the baghouse is outside of the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 2 and 5 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(b) Wet Scrubber

The Permittee shall record the pressure drop and flow rate across the wet scrubber used in conjunction with the rotary calcining kiln(s), at least once per day when the associated kiln(s) is/are in operation.

When for any one reading, the pressure drop across the scrubber is outside the normal range of 15 to 30 inches of water, or a range established during the latest stack test, the Permittee shall take reasonable response steps. Failure to take response steps shall be considered a deviation from this permit. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

When for any one reading, the flow rate of the scrubber is less than the minimum of 55 gallons per minute, or a minimum established during the latest stack test, the Permittee shall take reasonable response steps. Failure to take response steps shall be considered a deviation from this permit. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.
A pressure reading that is outside the above mentioned range or a flow rate that is below the above mentioned minimum is not a deviation from this permit, the Permittee shall take reasonable response steps. Failure to take response steps shall be considered a deviation from this permit. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

(c) Dry Scrubber

The Permittee shall record the lime injection flow rate across the dry scrubber, DS-101 used in conjunction with the rotary calcining kiln(s), at least once per day when the associated kiln(s) is/are in operation.

When for any one reading, the flow rate of the dry scrubber, DS-101, is less than the minimum of 8 kilograms per hour (or 133 milligrams per minute), or a minimum established during the latest stack test, the Permittee shall take reasonable response steps. Failure to take response steps shall be considered a deviation from this permit. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

D.1.9 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.1.10 Scrubber Failure Detection

(a) For a scrubber controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.1.11 Record Keeping Requirements

<table>
<thead>
<tr>
<th>Baghouse</th>
<th>Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>C-152 (exhausting Stack S123)</td>
<td>Moritz Mill (EU-152)</td>
</tr>
<tr>
<td>C-153 (exhausting Stack S124)</td>
<td>Moritz Mill (EU-153)</td>
</tr>
<tr>
<td>C-154 (exhausting Stack S125)</td>
<td>Moritz Mill (EU-154)</td>
</tr>
<tr>
<td>C-156 (exhausting Stack S-156)</td>
<td>Iron Oxide Silo (EU-103)</td>
</tr>
<tr>
<td>C-158 (exhausting indoors)</td>
<td>Weigh Hopper (EU158)</td>
</tr>
<tr>
<td>C-159 (exhausting indoors)</td>
<td>Weigh Hopper (EU-159)</td>
</tr>
<tr>
<td>C-122 (Stack S-122)</td>
<td>Banbury Mixer (EU-122)</td>
</tr>
<tr>
<td></td>
<td>Twin Banbury/Extruder/Mixer Line (EU-123B)</td>
</tr>
</tbody>
</table>

D.1.11 (a) To document the compliance status with Condition D.1.7, the Permittee shall maintain records of daily visible emission notations of the iron oxide unloading to Silo 2 (EU-105), Banbury mixer (EU-122) and the Twin Banbury/Extruder/Mixer Line (EU-123B), and Rotary Kilns (EU-101 and EU-102) stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).

D.1.11 (b) To document the compliance status with Condition D.1.8(a), the Permittee shall maintain records of the pressure drop on the baghouses used in conjunction with the following during normal operation. The Permittee shall include in its daily record when a pressure drop or a flow rate reading is not taken and the reason for the lack of a pressure drop or flow rate reading, (e.g., the process did not operate that day).

D.1.11 (c) To document the compliance status with Condition D.1.8(b), the Permittee shall maintain daily records of the following operational parameters for the wet scrubber associated with each rotary calcining kiln during normal operation:

1. pressure drop; and
2. flow rate.

The Permittee shall include in its daily record when a pressure drop or a flow rate reading is not taken and the reason for the lack of a pressure drop or flow rate reading (e.g., the process did not operate that day).

D.1.11 (d) To document the compliance status with Condition D.1.8(c), the Permittee shall maintain daily records of the lime injection rate for the dry scrubber DS-101 associated with the rotary kilns during normal operation. The Permittee shall include in its daily record when an injection rate reading is not taken and the reason for the lack of injection rate reading (e.g., the process did not operate that day).

D.1.11 (e) 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:

Insignificant Activities:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(2) Four (4) natural gas-fired space heaters, constructed in 1999, identified as EU-136, EU-141, EU-142, and EU-143, with a maximum heat input of 0.14 MMBtu per hour each, exhausting to stacks S-136, S-141, S-142, and S-143.

(3) Eight (8) natural gas-fired space heaters, constructed in 1999, identified as EU-137, EU-138, EU-140, EU-144, EU-145, EU-146, and EU-147, with a maximum heat input of 0.25 MMBtu per hour each, exhausting to stacks S-137, S-138, S-139, S-140, S-144, S-145, S-146, and S-147.

(4) Two (2) natural gas-fired space heaters, constructed in 1999, identified as EU-148 and EU-149, with a maximum heat input of 0.40 MMBtu per hour each, exhausting to stacks S-148 and S-149.

(5) One (1) natural gas-fired Cleaver Brooks boiler, constructed in 1999, identified as EU-151, with a maximum heat input of 2.5 MMBtu per hour, exhausting to stack S-151.

(6) Four (4) natural gas-fired space heaters, installed in 2014, identified as EU-170, EU-171, EU-172, EU-173, with a maximum heat input of 0.4 MMBtu per hour each.

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

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

D.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to Pt pounds per MMBtu heat input, as follows:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Unit ID</th>
<th>Pt (lb/MMBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Space heaters</td>
<td>EU-136, EU-141 - EU-143</td>
<td></td>
</tr>
<tr>
<td>Space heaters</td>
<td>EU-137 - EU-140, EU-144 - EU-147</td>
<td>0.60</td>
</tr>
<tr>
<td>Space heaters</td>
<td>EU-148, EU-149</td>
<td></td>
</tr>
<tr>
<td>Boiler</td>
<td>EU-151</td>
<td></td>
</tr>
<tr>
<td>Space heaters</td>
<td>EU-170 - EU-173</td>
<td></td>
</tr>
</tbody>
</table>
This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- [ ] Annual Compliance Certification Letter
- [ ] Test Result (specify)
- [ ] Report (specify)
- [ ] Notification (specify)
- [ ] Affidavit (specify)
- [ ] Other (specify)

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

Signature:

Printed Name:

Title/Position:

Date:
### FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
#### EMERGENCY OCCURRENCE REPORT

**Source Name:** Ilpea Industries Inc.  
**Source Address:** 1320 S. Main Street, Scottsburg, Indiana 47170  
**FESOP Permit No.:** F143-32451-00018

This form consists of 2 pages

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
</table>
| □ | This is an emergency as defined in 326 IAC 2-7-1(12)  
  | - The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and  
  | - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12. |

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

| Facility/Equipment/Operation: |
| Control Equipment: |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency: |
| Describe the cause of the Emergency: |
| **Date/Time Emergency started:** |  |
| **Date/Time Emergency was corrected:** |  |
| **Was the facility being properly operated at the time of the emergency?** | Y | N |
| **Describe:** |  |
| **Type of Pollutants Emitted:** TSP, PM-10, SO2, VOC, NOx, CO, Pb, other: |  |
| **Estimated amount of pollutant(s) emitted during emergency:** |  |
| **Describe the steps taken to mitigate the problem:** |  |
| **Describe the corrective actions/response steps taken:** |  |
| **Describe the measures taken to minimize emissions:** |  |
| **If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:** |  |

Form Completed by:______________________________

Title / Position:______________________________

Date:______________________________

Phone:______________________________
## INDYANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
### OFFICE OF AIR QUALITY
#### COMPLIANCE AND ENFORCEMENT BRANCH
##### FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
###### QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

**Source Name:** Ilpea Industries Inc.  
**Source Address:** 1320 S. Main Street, Scottsburg, Indiana 47170  
**FESOP Permit No.:** F143-32451-00018  

<table>
<thead>
<tr>
<th>Months: ___________ to ____________ Year: ______________</th>
</tr>
</thead>
</table>

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

### NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

### THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

*Permit Requirement* (specify permit condition #)

<table>
<thead>
<tr>
<th>Date of Deviation:</th>
<th>Duration of Deviation:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Number of Deviations:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Probable Cause of Deviation:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Response Steps Taken:</th>
</tr>
</thead>
</table>

*Permit Requirement* (specify permit condition #)

<table>
<thead>
<tr>
<th>Date of Deviation:</th>
<th>Duration of Deviation:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Number of Deviations:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Probable Cause of Deviation:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Response Steps Taken:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permit Requirement (specify permit condition #)</td>
</tr>
<tr>
<td>---</td>
</tr>
<tr>
<td>Date of Deviation:</td>
</tr>
<tr>
<td>Number of Deviations:</td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
</tr>
<tr>
<td>Response Steps Taken:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Deviation:</td>
<td>Duration of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Number of Deviations:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Deviation:</td>
<td>Duration of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Number of Deviations:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form Completed by: ____________________________
Title / Position: ____________________________
Date: ____________________________
Phone: ____________________________
New Source Review and Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY
Ilpea Industries Inc.
1320 S. Main Street
Scottsburg, Indiana 47170

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

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

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

Operation Permit No.: F143-32451-00018
Master AI ID: 11408

Original signed by:
Iryn Calilung, Section Chief
Permits Branch, Office of Air Quality
Issuance Date: August 5, 2013
Expiration Date: August 5, 2023

Significant Permit Revision No.: 143-34316-00018, issued on July 07, 2014
Significant Permit Revision No.: 143-35175-00018, issued on April 07, 2015
Significant Permit Revision No.: 143-37097-00018, issued on July 15, 2016
Significant Permit Revision No.: 143-38265-00018, issued on June 27, 2017
Administrative Amendment No.: 143-39190-00018, issued on October 20, 2017
Significant Permit Revision No.: 143-40532-00018, issued on February 27, 2019

Significant Permit Revision No.: 143-41469-00018

Issued by:
Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality
Issuance Date:
Expiration Date: August 5, 2023
TABLE OF CONTENTS

SECTION A  SOURCE SUMMARY ............................................................................................................... 4
   A.1  General Information [326 IAC 2-8-3(b)]
   A.2  Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
   A.3  Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]
   A.4  FESOP Applicability [326 IAC 2-8-2]

SECTION B  GENERAL CONDITIONS ................................................................................................... 9
   B.1  Definitions [326 IAC 2-8-1]
   B.2  Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]
   B.3  Term of Conditions [326 IAC 2-1.1-9.5]
   B.4  Enforceability [326 IAC 2-8-6][IC 13-17-12]
   B.5  Severability [326 IAC 2-8-4(4)]
   B.6  Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
   B.7  Duty to Provide Information [326 IAC 2-8-4(5)(E)]
   B.8  Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]
   B.9  Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
   B.10  Compliance Order Issuance [326 IAC 2-8-5(b)]
   B.11  Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]
   B.12  Emergency Provisions [326 IAC 2-8-12]
   B.13  Prior Permits Superseded [326 IAC 2-1.1-9.5]
   B.14  Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]
   B.15  Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]
   B.16  Permit Renewal [326 IAC 2-8-3(h)]
   B.17  Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]
   B.18  Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]
   B.20  Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]
   B.21  Transfer of Ownership or Operational Control [326 IAC 2-8-10]
   B.22  Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]
   B.23  Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

SECTION C  SOURCE OPERATION CONDITIONS ............................................................................... 19
   Emission Limitations and Standards [326 IAC 2-8-4(1)] ........................................................................ 19
   C.1  Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]
   C.2  Overall Source Limit [326 IAC 2-8]
   C.3  Opacity [326 IAC 5-1]
   C.4  Open Burning [326 IAC 4-1][IC 13-17-9]
   C.5  Incineration [326 IAC 4-2][326 IAC 9-1-2]
   C.6  Fugitive Dust Emissions [326 IAC 6-4]
   C.7  Stack Height [326 IAC 1-7]
   C.8  Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]
   C.9  Performance Testing [326 IAC 3-6]
   C.10  Compliance Requirements [326 IAC 2-1.1-11]
   C.11  Compliance Monitoring [326 IAC 2-8-5(a)(1)]
   C.12  Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)] .............................. 22
   C.13  Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]
   C.14  Risk Management Plan [326 IAC 2-8-4][40 CFR 68]
   C.15  Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]
C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] .............................................. 24

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]

Stratospheric Ozone Protection .................................................................................................. 25

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS ........................................................................... 26

Emission Limitations and Standards [326 IAC 2-8-4(1)] ................................................................. 28

D.1.1 PM PSD Minor Limit [326 IAC 2-2]

D.1.2 Particulate Matter Less Than 10 Microns (PM10) and PM2.5 [326 IAC 2-2][326 IAC 2-8-4]

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

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

Compliance Determination Requirements [326 IAC 2-8-4(1)] ....................................................... 30

D.1.5 Particulate Control

D.1.6 Testing Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)] ......................... 32

D.1.7 Visible Emissions Notations

D.1.8 Parametric Monitoring

D.1.9 Broken or Failed Bag Detection

D.1.10 Scrubber Failure Detection

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] .................................................. 35

D.1.11 Record Keeping Requirements

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS ................................................................. 36

Emission Limitations and Standards [326 IAC 2-8-4(1)] ................................................................. 36

D.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

CERTIFICATION ........................................................................................................................................ 37

EMERGENCY OCCURRENCE REPORT ............................................................................................... 38

QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT .............................................. 40
SECTION A  SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary plastics and magnetic plastics manufacturing operation.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>1320 S. Main Street, Scottsburg, Indiana 47170</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>812-752-2526</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>3053 (Gaskets, Packaging and Sealing Devices)</td>
</tr>
<tr>
<td></td>
<td>3399 (Primary Metal Products, n.e.c.)</td>
</tr>
<tr>
<td>County Location:</td>
<td>Scott</td>
</tr>
<tr>
<td>Source Location Status:</td>
<td>Attainment for all criteria pollutants</td>
</tr>
<tr>
<td>Source Status:</td>
<td>Federally Enforceable State Operating Permit Program</td>
</tr>
<tr>
<td></td>
<td>Minor Source, under PSD and Emission Offset Rules</td>
</tr>
<tr>
<td></td>
<td>Minor Source, Section 112 of the Clean Air Act</td>
</tr>
<tr>
<td></td>
<td>Not 1 of 28 Source Categories</td>
</tr>
</tbody>
</table>

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

The source consists of the following permitted emission units:

Plastic Pellet Process

The plastic pellet process blends PVC, filler and color and extrudes the mixture into plastic pellets.

(a)  Storage Silos:

(1)  Two (2) polyvinyl chloride (PVC) silos, constructed in 1999, and approved in 2014 for modification, identified as EU-106, and EU-107, each with a maximum capacity of 5,480 tons per year, each with bin vent filters, and exhausting outdoors; and The maximum capacity was revised from 7,950 tons per year to 5,480 tons per year in 2014.

(2)  One (1) calcium carbonate silo, constructed in 1999, identified as EU-108, with a maximum capacity of 7,950 tons per year with bin vent filters for control, and exhausting outdoors.

The PVC and calcium carbonate material is vacuumed from a rail car, equipped with a bin vent filter, to a silo and then vacuum fed into blenders. The process time in the blenders limits the production of plastic and the amount of calcium carbonate and PVC that can be used.

(b)  One (1) Ferrite Banbury mixer, constructed in 1999, modified in 2016 to exhaust outdoors, identified as EU-122, with a maximum capacity of 3,700 lbs per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122.
(c) One (1) plastic pellet production line, approved in 2016 for construction, identified as EU-112, with a maximum capacity of 3,500 pounds per hour, uncontrolled, and exhausting to wall vent 112.

(d) One (1) plastic pellet production line, constructed in 1999, identified as EU-113, with a maximum capacity of 700 pounds per hour, no control and exhausting to stack S-113.

(e) One (1) plastic pellet production line, constructed in 1999, identified as EU-115, with a maximum capacity of 1,200 pounds per hour, no control and exhausting indoors.

(f) One (1) plastic pellet production line, constructed in 1999, identified as EU-116, with a maximum capacity of 1,200 pounds per hour, no control and exhausting to stack S-116.

(g) One (1) plastic pellet production line, constructed in 1999, identified as EU-117, with a maximum capacity of 1,500 pounds per hour, no control and exhausting indoors.

(h) One (1) plastic pellet production line, constructed in 1999, identified as EU-118, with a maximum capacity of 1,500 pounds per hour, no control and exhausting indoors.

Powder Metal Process

(i) Iron oxide unloading to Silo 1, identified as EU-103, constructed in 2014, approved in 2018 for modification, with a maximum capacity of 25,000 pounds per hour and a bottlenecked capacity of 96,000 pounds per day, using baghouse C-156 as control and exhausting to stack S-156.

(j) Iron oxide unloading to Silo 2, identified as EU-105, constructed in 2014, approved in 2018 for modification, with a maximum capacity of 25,000 pounds per hour and a bottlenecked capacity of 96,000 pounds per day, using baghouse C-157 as control and exhausting to stack S-157.

(k) One (1) weigh hopper, identified as EU-156, constructed in 2014, modified in 2015, approved in 2018 for modification, with a maximum capacity of 8,000 pounds per hour and a bottlenecked capacity of 48,000 pounds per day, using baghouse C-156 as control and exhausting to stack S-156.

(l) One (1) weigh hopper, identified as EU-157, approved in 2013 for construction, approved in 2015 for modification, approved in 2018 for modification, with a maximum capacity of 8,000 pounds per hour and a bottlenecked capacity of 48,000 pounds per day, using baghouse C-156 as control and exhausting to stack S-156.

(m) One (1) Cibec Mixer, constructed in 2014, modified in 2015 to remove a baghouse and correct the maximum capacity, and approved in 2016 for modification to increase the maximum number of batches per day, identified as EU-123C, with a maximum capacity of 8,000 pounds of iron oxide and 1,427 lbs of strontium carbonate, six (6) batches per day, using no control, and exhausting indoors.

(n) One (1) Cibec Mixer, approved in 2014 for construction, approved in 2015 for modification to remove a baghouse and correct the maximum capacity, and approved in 2016 for modification to increase the maximum number of batches per day, identified as EU-125, with a maximum capacity of 8,000 pounds of iron oxide and 1,427 lbs of strontium carbonate per batch, six (6) batches per day, using no control, and exhausting indoors.
(o) One (1) Strontium weigh hopper (#1), constructed in 2014, identified as EU-158, with a maximum capacity of 870 pounds of Strontium Carbonate per hour, using a baghouse for control, identified as C-158, and exhausting indoors.

(p) One (1) Strontium weigh hopper (#2), identified as EU-159, with a maximum capacity of 870 pounds of Strontium Carbonate per hour, using a baghouse for control, identified as C-159, and exhausting indoors.

This hopper was originally approved in 2014 for construction; it was approved for construction extension in 2016 and again in 2019.

(q) One (1) Small rotary calcining kiln, constructed in 2014, identified as EU-101, approved in 2019 to change control, with a maximum capacity of 3,000 lbs of iron oxide mixture solids per hour and a maximum heat input capacity of 10.00 MMBtu/hr, using a wet scrubber (identified as C-101-2) as control until a new dry scrubber (identified as DS-101) is constructed, at which time wet scrubber C-101-2 will be removed, and exhausting to stack S-101-2.

(r) One (1) Large rotary calcining kiln, constructed in 2016, identified as EU-102, approved in 2019 to change control, with a maximum capacity of 3,500 lbs of iron oxide mixture solids per hour and a maximum heat input capacity of 10.00 MMBtu/hr, using a wet scrubber (identified as C-101-2) as control until a new dry scrubber (identified as DS-101) is constructed, at which time wet scrubber C-101-2 will be removed, and exhausting to stack S-101-2.

Iron Oxide (from silos) and Strontium Carbonate (bags) are fed into the kilns and heated to form iron clinkers. The clinkers are milled from large particle size to a very fine powder which is used to make magnetic plastic. The milled material is sent to the Banbury mixer so plastic material can be added to form a compound and extruded to form magnetic plastic strips and rolls for plastic magnets.

(s) One (1) Moritz Mill (#1), constructed in 2014, modified in 2017 to exhaust outdoors, identified as EU-152, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-152, and exhausting to stack S123.

(t) One (1) Moritz Mill (#2), constructed in 2014, modified in 2017 to exhaust outdoors, identified as EU-153, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-153, and exhausting to stack S124.

(u) One (1) Moritz Mill (#3), identified as EU-154, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-154, and exhausting to stack S125.

The above unit was originally approved in 2013 for construction. The maximum capacity was revised from 2,380 lbs per hour to 1,700 lbs per hour in 2014. It was then approved for construction extension in 2016 and again in 2019.

(v) One (1) Ferrite twin ICMA banbury/extruder/mixer line, constructed in 2013, approved in 2016 to correct the maximum capacity, approved in 2017 for modification to increase the maximum capacity, identified as EU-123B, with a maximum capacity of 4,400 pounds per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122, and consisting of the following:

(1) One (1) 275- liter capacity mixer, and

(2) Two (2) twin banbury extruders/mixers
The banbury mixes powder metal and plastic together to form a magnetic compound. Ingredients used are chlorinated polyethylene, ethylene vinyl acetate, stearic acid, propylene based elastomer and epoxidized soybean oil.

The baghouse C-122 is a common control device used for twin banbury/extruder/mixer line EU-123B and Banbury Mixer EU-122.

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

The source also consists of the following insignificant activities:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(1) One (1) natural gas-fired air make-up unit, constructed in 1999, identified as EU-119, with a maximum heat input of 1.1 MMBtu per hour, exhausting to stack S-119.

(2) Four (4) natural gas-fired space heaters, constructed in 1999, identified as EU-136, EU-141, EU-142, and EU-143, with a maximum heat input of 0.14 MMBtu per hour each, exhausting to stacks S-136, S-141, S-142, and S-143.

(3) Eight (8) natural gas-fired space heaters, constructed in 1999, identified as EU-137, EU-138, EU-139, EU-140, EU-144, EU-145, EU-146, and EU-147, with a maximum heat input of 0.25 MMBtu per hour each, exhausting to stacks S-137, S-138, S-139, S-140, S-144, S-145, S-146, and S-147.

(4) Two (2) natural gas-fired space heaters, constructed in 1999, identified as EU-148 and EU-149, with a maximum heat input of 0.40 MMBtu per hour each, exhausting to stacks S-148 and S-149.

(5) One (1) natural gas-fired Cleaver Brooks boiler, constructed in 1999, identified as EU-151, with a maximum heat input of 2.5 MMBtu per hour, exhausting to stack S-151.

(6) Four (4) natural gas-fired space heaters, installed in 2014, identified as EU-170, EU-171, EU-172, EU-173, with a maximum heat input of 0.4 MMBtu per hour each.

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: cutting torches, soldering equipment, and welding equipment.

(c) Repair activities, including the following: Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(d) Conveyors as follows: enclosed systems for conveying plastic raw materials and plastic finished goods.

(e) Routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process, including the following: purging of gas lines, purging of vessels.

(f) Blowdown for a cooling tower.

(g) Emissions from a laboratory as defined in 326 IAC 2-7-1(21)(D).
(l) Emissions from research and development activities as defined in 326 IAC 2-7-1(21)(D).

(h) Waste water pre-treatment system, with an oil and grease content less than one percent (1) by volume.

(i) Eleven (11) magnetic extrusion lines, each with a throughput of 450 lbs per hour, no control, and exhausting indoors.

(j) One (1) plastic extrusion line, with a throughput of 400 lbs per hour, no control, and exhausting indoors.

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

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

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

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

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

(a) This permit, F143-32451-00018, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

B.4 Enforceability [326 IAC 2-8-6][IC 13-17-12]

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 [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

1. it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and

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

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

(c) The annual compliance certification report shall include the following:

1. The appropriate identification of each term or condition of this permit that is the basis of the certification;

2. The compliance status;

3. Whether compliance was continuous or intermittent;

4. The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

5. Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
B.10 Compliance Order Issuance  [326 IAC 2-8-5(b)]

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The
PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Southwest Regional Office and Southeast Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch) Facsimile Number: 317-233-6865 Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304, Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

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

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

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

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

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F143-32451-00018 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.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]
The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]
(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
(1) That this permit contains a material mistake.
(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]
(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
Request for renewal shall be submitted to:

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

<table>
<thead>
<tr>
<th>Request for renewal shall be submitted to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Indiana Department of Environmental Management</td>
</tr>
<tr>
<td>Permit Administration and Support Section, Office of Air Quality</td>
</tr>
<tr>
<td>100 North Senate Avenue</td>
</tr>
<tr>
<td>MC 61-53 IGCN 1003</td>
</tr>
<tr>
<td>Indianapolis, Indiana 46204-2251</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>A timely renewal application is one that is:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and</td>
</tr>
<tr>
<td>(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.</td>
</tr>
</tbody>
</table>

| (c) If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application. |

<table>
<thead>
<tr>
<th>B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.</td>
</tr>
<tr>
<td>(b) Any application requesting an amendment or modification of this permit shall be submitted to:</td>
</tr>
<tr>
<td>Indiana Department of Environmental Management</td>
</tr>
<tr>
<td>Permit Administration and Support Section, Office of Air Quality</td>
</tr>
<tr>
<td>100 North Senate Avenue</td>
</tr>
<tr>
<td>MC 61-53 IGCN 1003</td>
</tr>
<tr>
<td>Indianapolis, Indiana 46204-2251</td>
</tr>
</tbody>
</table>

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

| (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)] |

<table>
<thead>
<tr>
<th>B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:</td>
</tr>
<tr>
<td>(1) The changes are not modifications under any provision of Title I of the Clean Air Act;</td>
</tr>
<tr>
<td>(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;</td>
</tr>
</tbody>
</table>
(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

- United States Environmental Protection Agency, Region 5
  Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
  77 West Jackson Boulevard
  Chicago, Illinois 60604-3590

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

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

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

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:
(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

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

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

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

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

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

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

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.
B.23 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

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

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

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

C.3 Opacity  [326 IAC 5-1]

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

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

C.4 Open Burning [326 IAC 4-1][IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]
The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

C.8 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]
(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.
Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

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

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

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]
If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

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

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

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

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

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

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The date's analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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

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

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:
Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1
Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.
Emissions Unit Description:

Plastic Pellet Process
The plastic pellet process blends PVC, filler and color and extrudes the mixture into plastic pellets.

(a) Storage Silos:
   (1) Two (2) polyvinyl chloride (PVC) silos, constructed in 1999, and approved in 2014 for modification, identified as EU-106, and EU-107, each with a maximum capacity of 5,480 tons per year, each with bin vent filters, and exhausting outdoors; and

   The maximum capacity was revised from 7,950 tons per year to 5,480 tons per year in 2014.

   (2) One (1) calcium carbonate silo, constructed in 1999, identified as EU-108, with a maximum capacity of 7,950 tons per year with bin vent filters for control, and exhausting outdoors.

   The PVC and calcium carbonate material is vacuumed from a rail car, equipped with a bin vent filter, to a silo and then vacuum fed into blenders. The process time in the blenders limits the production of plastic and the amount of calcium carbonate and PVC that can be used.

(b) One (1) Ferrite Banbury mixer, constructed in 1999, modified in 2016 to exhaust outdoors, identified as EU-122, with a maximum capacity of 3,700 lbs per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122.

(c) One (1) plastic pellet production line, approved in 2016 for construction, identified as EU-112, with a maximum capacity of 3,500 pounds per hour, uncontrolled, and exhausting to wall vent 112.

(d) One (1) plastic pellet production line, constructed in 1999, identified as EU-113, with a maximum capacity of 700 pounds per hour, no control and exhausting to stack S-113.

(e) One (1) plastic pellet production line, constructed in 1999, identified as EU-115, with a maximum capacity of 1,200 pounds per hour, no control and exhausting indoors.

(f) One (1) plastic pellet production line, constructed in 1999, identified as EU-116, with a maximum capacity of 1,200 pounds per hour, no control and exhausting to stack S-116.

(g) One (1) plastic pellet production line, constructed in 1999, identified as EU-117, with a maximum capacity of 1,500 pounds per hour, no control and exhausting indoors.

(h) One (1) plastic pellet production line, constructed in 1999, identified as EU-118, with a maximum capacity of 1,500 pounds per hour, no control and exhausting indoors.

Powder Metal Process

(i) Iron oxide unloading to Silo 1, identified as EU-103, constructed in 2014, approved in 2018 for modification, with a maximum capacity of 25,000 pounds per hour and a bottlenecked capacity of 96,000 pounds per day, using baghouse C-156 as control and exhausting to stack S-156.
(j) Iron oxide unloading to Silo 2, identified as EU-105, constructed in 2014, approved in 2018 for modification, with a maximum capacity of 25,000 pounds per hour and a bottlenecked capacity of 96,000 pounds per day, using baghouse C-157 as control and exhausting to stack S-157.

(k) One (1) weigh hopper, identified as EU-156, constructed in 2014, modified in 2015, approved in 2018 for modification, with a maximum capacity of 8,000 pounds per hour and a bottlenecked capacity of 48,000 pounds per day, using baghouse C-156 as control and exhausting to stack S-156.

(l) One (1) weigh hopper, identified as EU-157, approved in 2013 for construction, approved in 2015 for modification, approved in 2018 for modification, with a maximum capacity of 8,000 pounds per hour and a bottlenecked capacity of 48,000 pounds per day, using baghouse C-156 as control and exhausting to stack S-156.

(m) One (1) Cibec Mixer, constructed in 2014, modified in 2015 to remove a baghouse and correct the maximum capacity, and approved in 2016 for modification to increase the maximum number of batches per day, identified as EU-123C, with a maximum capacity of 8,000 pounds of iron oxide and 1,427 lbs of strontium carbonate, six (6) batches per day, using no control, and exhausting indoors.

(n) One (1) Cibec Mixer, approved in 2014 for construction, approved in 2015 for modification to remove a baghouse and correct the maximum capacity, and approved in 2016 for modification to increase the maximum number of batches per day, identified as EU-125, with a maximum capacity of 8,000 pounds of iron oxide and 1,427 lbs of strontium carbonate per batch, six (6) batches per day, using no control, and exhausting indoors.

(o) One (1) Strontium weigh hopper (#1), constructed in 2014, identified as EU-158, with a maximum capacity of 870 pounds of Strontium Carbonate per hour, using a baghouse for control, identified as C-158, and exhausting indoors.

(p) One (1) Strontium weigh hopper (#2), identified as EU-159, with a maximum capacity of 870 pounds of Strontium Carbonate per hour, using a baghouse for control, identified as C-159, and exhausting indoors.

This hopper was originally approved in 2014 for construction; it was approved for construction extension in 2016 and again in 2019.

(q) One (1) Small rotary calcining kiln, constructed in 2014, identified as EU-101, approved in 2019 to change control, with a maximum capacity of 3,000 lbs of iron oxide mixture solids per hour and a maximum heat input capacity of 10.00 MMBtu/hr, using a wet scrubber (identified as C-101-2) as control until a new dry scrubber (identified as DS-101) is constructed, at which time wet scrubber C-101-2 will be removed, and exhausting to stack S-101-2.

(r) One (1) Large rotary calcining kiln, constructed in 2016, identified as EU-102, approved in 2019 to change control, with a maximum capacity of 3,500 lbs of iron oxide mixture solids per hour and a maximum heat input capacity of 10.00 MMBtu/hr, using a wet scrubber (identified as C-101-2) as control until a new dry scrubber (identified as DS-101) is constructed, at which time wet scrubber C-101-2 will be removed, and exhausting to stack S-101-2.

Iron Oxide (from silos) and Strontium Carbonate (bags) are fed into the kilns and heated to form iron clinkers. The clinkers are milled from large particle size to a very fine powder which is used to make magnetic plastic. The milled material is sent to the Banbury mixer so plastic material can be added to form a compound and extruded to form magnetic plastic strips and rolls for plastic magnets.
(s) One (1) Moritz Mill (#1), constructed in 2014, modified in 2017 to exhaust outdoors, identified as EU-152, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-152, and exhausting to stack S123.

(t) One (1) Moritz Mill (#2), constructed in 2014, modified in 2017 to exhaust outdoors, identified as EU-153, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-153, and exhausting to stack S124.

(u) One (1) Moritz Mill (#3), identified as EU-154, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-154, and exhausting to stack S125.

The above unit was originally approved in 2013 for construction. The maximum capacity was revised from 2,380 lbs per hour to 1,700 lbs per hour in 2014. It was then approved for construction extension in 2016 and again in 2019.

(v) One (1) Ferrite twin ICMA banbury/extruder/mixer line, constructed in 2013, approved in 2016 to correct the maximum capacity, approved in 2017 for modification to increase the maximum capacity, identified as EU-123B, with a maximum capacity of 4,400 pounds per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122, and consisting of the following:

1. One (1) 275- liter capacity mixer, and
2. Two (2) twin banbury extruders/mixers

The banbury mixes powder metal and plastic together to form a magnetic compound. Ingredients used are chlorinated polyethylene, ethylene vinyl acetate, stearic acid, propylene based elastomer and epoxidized soybean oil.

The baghouse C-122 is a common control device used for twin banbury/extruder/mixer line EU-123B and Banbury Mixer EU-122.

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

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

D.1.1 PM PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

(a) The PM emissions after control from each unit listed in the table below shall not exceed the values shown:

<table>
<thead>
<tr>
<th>Control Device</th>
<th>Emission Units</th>
<th>PM Limitations (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>C-101-2 (exhausting to S101-2) or DS-101 (exhausting to S101-2)</td>
<td>Powder metal calcining process (kiln EU-101 and/or EU-102)</td>
<td>11.35</td>
</tr>
<tr>
<td>C-152 (exhausting Stack S123)</td>
<td>Moritz Mill (EU-152)</td>
<td>3.68</td>
</tr>
<tr>
<td>C-153 (exhausting Stack S124)</td>
<td>Moritz Mill (EU-153)</td>
<td>3.68</td>
</tr>
<tr>
<td>C-154 (exhausting Stack S125)</td>
<td>Moritz Mill (EU-154)</td>
<td>3.68</td>
</tr>
<tr>
<td>C-156 (exhausting Stack S-156)</td>
<td>Iron Oxide Silo (EU-103), Weigh Hopper EU-156, Weigh Hopper EU-157</td>
<td>1.19</td>
</tr>
<tr>
<td>C-157 (exhausting Stack S-157)</td>
<td>Iron Oxide Silo (EU-105)</td>
<td>1.19</td>
</tr>
<tr>
<td>C-158 (exhausting indoors)</td>
<td>Weigh Hopper (EU158)</td>
<td>4.30</td>
</tr>
<tr>
<td>C-159 (exhausting indoors)</td>
<td>Weigh Hopper ( EU-159)</td>
<td>4.30</td>
</tr>
<tr>
<td>C-122 (Stack S-122)</td>
<td>Banbury Mixer (EU-122)</td>
<td>1.05</td>
</tr>
<tr>
<td></td>
<td>Twin Banbury/Extruder/Mixer Line (EU-123B)</td>
<td></td>
</tr>
</tbody>
</table>
(b) The Permittee shall operate only one (1) kiln (EU-101 or EU-102) at a time, until the dry scrubber (DS-101) begins operation, at which time both kilns may run simultaneously or separately.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Particulate Matter Less Than 10 Microns (PM10) and PM2.5 [326 IAC 2-2][326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

(a) The PM10 and PM2.5 emissions after control from each unit listed in the table below shall not exceed the values shown:

<table>
<thead>
<tr>
<th>Control Device</th>
<th>Emission Units</th>
<th>PM10 Limitations (lb/hr)</th>
<th>PM2.5 Limitations (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>C-101-2 (exhausting to S101-2) or DS-101 (exhausting to S101-2)</td>
<td>Powder metal calcining process (klin EU-101 and/or EU-102)</td>
<td>2.06</td>
<td>2.06</td>
</tr>
<tr>
<td>C-152 (exhausting Stack S123)</td>
<td>Moritz Mill (EU-152)</td>
<td>3.68</td>
<td>3.68</td>
</tr>
<tr>
<td>C-153 (exhausting Stack S124)</td>
<td>Moritz Mill (EU-153)</td>
<td>3.68</td>
<td>3.68</td>
</tr>
<tr>
<td>C-154 (exhausting Stack S125)</td>
<td>Moritz Mill (EU-154)</td>
<td>3.68</td>
<td>3.68</td>
</tr>
<tr>
<td>C-156 (exhausting Stack S-156)</td>
<td>Iron Oxide Silo (EU-103), Weigh Hopper EU-156, Weigh Hopper EU-157</td>
<td>1.19</td>
<td>1.19</td>
</tr>
<tr>
<td>C-157 (exhausting Stack S-157)</td>
<td>Iron Oxide Silo (EU-105)</td>
<td>1.19</td>
<td>1.19</td>
</tr>
<tr>
<td>C-158 (exhausting indoors)</td>
<td>Weigh Hopper (EU158)</td>
<td>1.55</td>
<td>1.55</td>
</tr>
<tr>
<td>C-159 (exhausting indoors)</td>
<td>Weigh Hopper (EU-159)</td>
<td>1.55</td>
<td>1.55</td>
</tr>
<tr>
<td>C-122 (Stack S-122)</td>
<td>Banbury Mixer (EU-122), Twin Banbury/Extruder/Mixer Line (EU-123B)</td>
<td>1.05</td>
<td>1.05</td>
</tr>
</tbody>
</table>

(b) The Permittee shall operate only one (1) kiln (EU-101 or EU-102) at a time, until the dry scrubber (DS-101) begins operation, at which time both kilns may run simultaneously or separately.

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

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from each unit shall not exceed the following:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Process Weight Rate (tons/hr)</th>
<th>PM Limitations (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rotary Calcining Kiln (EU-101)</td>
<td>1.5</td>
<td>5.38</td>
</tr>
<tr>
<td>Rotary Calcining Kiln (EU-102)</td>
<td>1.75</td>
<td>5.97</td>
</tr>
<tr>
<td>Moritz Mill (EU-152)</td>
<td>0.85</td>
<td>3.68</td>
</tr>
<tr>
<td>Moritz Mill (EU-153)</td>
<td>0.85</td>
<td>3.68</td>
</tr>
<tr>
<td>Emission Unit</td>
<td>Process Weight Rate (tons/hr)</td>
<td>PM Limitations (lb/hr)</td>
</tr>
<tr>
<td>---------------------------------------</td>
<td>------------------------------</td>
<td>------------------------</td>
</tr>
<tr>
<td>Moritz Mill (EU-154)</td>
<td>0.85</td>
<td>3.68</td>
</tr>
<tr>
<td>Weigh Hopper (EU-156)</td>
<td>0.83</td>
<td>3.63</td>
</tr>
<tr>
<td>Weigh Hopper (EU-157)</td>
<td>0.83</td>
<td>3.63</td>
</tr>
<tr>
<td>Weigh Hopper (EU-158)</td>
<td>0.44</td>
<td>2.35</td>
</tr>
<tr>
<td>Cibec Mixer (EU123C)</td>
<td>1.59</td>
<td>5.59</td>
</tr>
<tr>
<td>Weigh Hopper (EU-159)</td>
<td>0.44</td>
<td>2.35</td>
</tr>
<tr>
<td>Cibec Mixer (EU125)</td>
<td>1.59</td>
<td>5.59</td>
</tr>
<tr>
<td>Banbury Mixer (EU-122)</td>
<td>1.85</td>
<td>6.19</td>
</tr>
<tr>
<td>Twin Banbury/Extruder/Mixer Line (EU-123B)</td>
<td>2.20</td>
<td>6.95</td>
</tr>
<tr>
<td>Iron Oxide Silo (EU-103)</td>
<td>0.83</td>
<td>3.63</td>
</tr>
<tr>
<td>Iron Oxide Silo (EU-105)</td>
<td>0.83</td>
<td>3.63</td>
</tr>
</tbody>
</table>

These pounds per hour limitations were calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

\[ E = 4.10 P^{0.67} \]

where \( E \) = rate of emission in pounds per hour and \( P \) = process weight rate in tons per hour.

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

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

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.5 Particulate Control

(a) In order to comply with Conditions D.1.1, D.1.2, and D.1.3, either the wet scrubber, C-101-2, or the dry scrubber, DS-101, for particulate control shall be in operation and control emissions from the rotary calcining kilns, identified as EU-101 and EU-102, at all times that the associated kiln(s) is/are in operation.

(b) In order to comply with Conditions D.1.1, D.1.2, and D.1.3, the baghouses for particulate control shall be in operation and control emissions from the following:

<table>
<thead>
<tr>
<th>Baghouse</th>
<th>Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>C-152 (exhausting Stack S123)</td>
<td>Moritz Mill (EU-152)</td>
</tr>
<tr>
<td>C-153 (exhausting Stack S124)</td>
<td>Moritz Mill (EU-153)</td>
</tr>
<tr>
<td>C-154 (exhausting Stack S125)</td>
<td>Moritz Mill (EU-154)</td>
</tr>
<tr>
<td>C-156 (exhausting Stack S-156)</td>
<td>Iron Oxide Silo (EU-103), Weigh Hopper EU-156, Weigh Hopper EU-157</td>
</tr>
<tr>
<td>C-157 (exhausting Stack S-157)</td>
<td>Iron Oxide Silo (EU-105)</td>
</tr>
<tr>
<td>C-158 (exhausting indoors)</td>
<td>Weigh Hopper (EU158)</td>
</tr>
<tr>
<td>C-159 (exhausting indoors)</td>
<td>Weigh Hopper (EU-159)</td>
</tr>
<tr>
<td>C-122 (Stack S-122)</td>
<td>Twin Banbury/Extruder/Mixer Line (EU-123B)</td>
</tr>
</tbody>
</table>

at all times that these units are in operation.

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

D.1.6 Testing Requirements [326 IAC 2-1.1-11]

(a) In order to demonstrate the compliance status with Conditions D.1.1, D.1.2, and D.1.3, not later than one hundred and eighty (180) days after initial startup of the Twin Banbury/Extruder/Mixer Line (EU-123B), the Permittee shall conduct PM, PM10, and PM2.5 testing for the Banbury Mixer (EU-122) and Twin Banbury/Extruder/Mixer Line (EU-123B), utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid demonstration.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee’s obligations with regard to the performance testing required by this condition.

PM10 and PM2.5 includes filterable and condensable PM.

Baghouse C-122 is a common control device used for twin banbury/extruder/mixer line EU-123B and Banbury Mixer EU-122.

(b) In order to demonstrate the compliance status with Conditions D.1.1, D.1.2, and D.1.3,

(i) The Permittee shall conduct PM, PM10, and PM2.5 testing for each of the two rotary calcining kilns (EU-101 and EU-102) after its control (wet scrubber), utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

(ii) No later than one hundred and eighty (180) days after initial startup of the dry scrubber (DS-101), the Permittee shall conduct PM, PM10, and PM2.5 testing for each of the two rotary calcining kilns (EU-101 and EU-102) after its control (dry scrubber), utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

(iii) The Permittee shall conduct the PM, PM10, and PM2.5 testing specified in either Condition D.1.6(b)(i) or Condition D.1.6(b)(ii), whichever occurs first.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee’s obligations with regard to the performance testing required by this condition.

PM10 and PM2.5 includes filterable and condensable PM.

(c) In order to demonstrate the compliance status with Conditions D.1.1, D.1.2, and D.1.3, not later than one hundred and eighty (180) days after initial startup of the following, the Permittee shall conduct PM, PM10, and PM2.5 testing:

<table>
<thead>
<tr>
<th>Baghouse</th>
<th>Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>C-122 (Stack S-122)</td>
<td>Banbury Mixer (EU-122)</td>
</tr>
<tr>
<td></td>
<td>Twin Banbury/Extruder/Mixer Line (EU-123B)</td>
</tr>
</tbody>
</table>
utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligations with regard to the performance testing required by this condition.

PM10 and PM2.5 includes filterable and condensable PM.

(d) In order to demonstrate the compliance status with Conditions D.1.1, D.1.2, and D.1.3, not later than one hundred and eighty (180) days after initial startup of the new baghouses with the Moritz Mills, the Permittee shall conduct PM, PM10, and PM2.5 testing:

<table>
<thead>
<tr>
<th>Baghouse</th>
<th>Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>C-152 (exhausting Stack S123)</td>
<td>Moritz Mill (EU-152)</td>
</tr>
<tr>
<td>C-153 (exhausting Stack S124)</td>
<td>Moritz Mill (EU-153)</td>
</tr>
<tr>
<td>C-154 (exhausting Stack S125)</td>
<td>Moritz Mill (EU-154)</td>
</tr>
</tbody>
</table>

utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

If in case the existing baghouses are not replaced with these new baghouses, tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration of the existing baghouses.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligations with regard to the performance testing required by this condition.

PM10 and PM2.5 includes filterable and condensable PM.

(e) In order to assure compliance with Conditions D.1.1, D.1.2, and D.1.3, not later than 180 days after the issuance date of this permit, Permit No 143-40532-00018 or 180 days after the commencement of operation of the revised configuration of baghouse C-156, whichever is later, the Permittee shall perform PM, PM10, and PM2.5 testing of the baghouse C-156 utilizing methods approved by the commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

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

D.1.7 Visible Emissions Notations

(a) Visible emission notations of the Rotary Kilns, Banbury Mixer and Twin Banbury/Extruder/Mixer, and iron oxide unloading to Silo 2 stack exhausts (S-101-2, S-122, and S-157) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reporting required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.8 Parametric Monitoring

(a) The Permittee shall record the pressure drop across the baghouses used in conjunction with the following:

<table>
<thead>
<tr>
<th>Baghouse</th>
<th>Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>C-152 (exhausting Stack S123)</td>
<td>Moritz Mill (EU-152)</td>
</tr>
<tr>
<td>C-153 (exhausting Stack S124)</td>
<td>Moritz Mill (EU-153)</td>
</tr>
<tr>
<td>C-154 (exhausting Stack S125)</td>
<td>Moritz Mill (EU-154)</td>
</tr>
<tr>
<td>C-156 (exhausting Stack S-156)</td>
<td>Iron Oxide Silo (EU-103)</td>
</tr>
<tr>
<td>C-158 (exhausting indoors)</td>
<td>Weigh Hopper (EU158)</td>
</tr>
<tr>
<td>C-159 (exhausting indoors)</td>
<td>Weigh Hopper (EU-159)</td>
</tr>
<tr>
<td>C-122 (Stack S-122)</td>
<td>Banbury Mixer (EU-122)</td>
</tr>
<tr>
<td>C-156 (exhausting indoors)</td>
<td>Twin Banbury/Extruder/Mixer Line (EU-123B)</td>
</tr>
</tbody>
</table>

at least once per day when the process is in operation. When, for any one reading, the pressure drop across the baghouse is outside of the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 2 and 5 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

(b) Wet Scrubber

The Permittee shall record the pressure drop and flow rate across the wet scrubber used in conjunction with the rotary calcining kiln(s), at least once per day when the associated kiln(s) is/are in operation.

When for any one reading, the pressure drop across the scrubber is outside the normal range of 15 to 30 inches of water, or a range established during the latest stack test, the Permittee shall take reasonable response steps. Failure to take response steps shall be considered a deviation from this permit. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

When for any one reading, the flow rate of the scrubber is less than the minimum of 55 gallons per minute, or a minimum established during the latest stack test, the Permittee shall take reasonable response steps. Failure to take response steps shall be considered a deviation from this permit. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.
A pressure reading that is outside the above mentioned range or a flow rate that is below the above mentioned minimum is not a deviation from this permit, the Permittee shall take reasonable response steps. Failure to take response steps shall be considered a deviation from this permit. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

(c) Dry Scrubber

The Permittee shall record the lime injection flow rate across the dry scrubber, DS-101 used in conjunction with the rotary calcining kiln(s), at least once per day when the associated kiln(s) is/are in operation.

When for any one reading, the flow rate of the dry scrubber, DS-101, is less than the minimum of 8 kilograms per hour (or 133 milligrams per minute), or a minimum established during the latest stack test, the Permittee shall take reasonable response steps. Failure to take response steps shall be considered a deviation from this permit. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

D.1.9 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.1.10 Scrubber Failure Detection

(a) For a scrubber controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

**D.1.11 Record Keeping Requirements**

<table>
<thead>
<tr>
<th>Baghouse</th>
<th>Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>C-152 (exhausting Stack S123)</td>
<td>Moritz Mill (EU-152)</td>
</tr>
<tr>
<td>C-153 (exhausting Stack S124)</td>
<td>Moritz Mill (EU-153)</td>
</tr>
<tr>
<td>C-154 (exhausting Stack S125)</td>
<td>Moritz Mill (EU-154)</td>
</tr>
<tr>
<td>C-156 (exhausting Stack S-156)</td>
<td>Iron Oxide Silo (EU-103)</td>
</tr>
<tr>
<td>C-158 (exhausting indoors)</td>
<td>Weigh Hopper (EU158)</td>
</tr>
<tr>
<td>C-159 (exhausting indoors)</td>
<td>Weigh Hopper (EU-159)</td>
</tr>
<tr>
<td>C-122 (Stack S-122)</td>
<td>Banbury Mixer (EU-122)</td>
</tr>
<tr>
<td></td>
<td>Twin Banbury/Extruder/Mixer Line (EU-123B)</td>
</tr>
</tbody>
</table>

D.1.11.1 To document the compliance status with Condition D.1.7, the Permittee shall maintain records of daily visible emission notations of the iron oxide unloading to Silo 2 (EU-105), Banbury mixer (EU-122) and the Twin Banbury/Extruder/Mixer Line (EU-123B), and Rotary Kilns (EU-101 and EU-102) stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).

D.1.11.2 To document the compliance status with Condition D.1.8(a), the Permittee shall maintain records of the pressure drop on the baghouses used in conjunction with the following during normal operation. The Permittee shall include in its daily record when a pressure drop or a flow rate reading is not taken and the reason for the lack of a pressure drop or flow rate reading (e.g., the process did not operate that day).

D.1.11.3 To document the compliance status with Condition D.1.8(b), the Permittee shall maintain daily records of the following operational parameters for the wet scrubber associated with each rotary calcining kiln during normal operation:

1. pressure drop; and
2. flow rate.

The Permittee shall include in its daily record when a pressure drop or a flow rate reading is not taken and the reason for the lack of a pressure drop or flow rate reading (e.g., the process did not operate that day).

D.1.11.4 To document the compliance status with Condition D.1.8(c), the Permittee shall maintain daily records of the lime injection rate for the dry scrubber DS-101 associated with the rotary kilns during normal operation. The Permittee shall include in its daily record when an injection rate reading is not taken and the reason for the lack of injection rate reading (e.g., the process did not operate that day).

D.1.11.5 Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.
Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to Pt pounds per MMBtu heat input, as follows:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Unit ID</th>
<th>Pt (lb/MMBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Space heaters</td>
<td>EU-136, EU-141 - EU-143</td>
<td></td>
</tr>
<tr>
<td>Space heaters</td>
<td>EU-137 - EU-140, EU-144 - EU-147</td>
<td></td>
</tr>
<tr>
<td>Space heaters</td>
<td>EU-148, EU-149</td>
<td>0.60</td>
</tr>
<tr>
<td>Boiler</td>
<td>EU-151</td>
<td></td>
</tr>
<tr>
<td>Space heaters</td>
<td>EU-170 - EU-173</td>
<td></td>
</tr>
</tbody>
</table>
# FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

<table>
<thead>
<tr>
<th>Source Name:</th>
<th>Ilpea Industries Inc.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Address:</td>
<td>1320 S. Main Street, Scottsburg, Indiana 47170</td>
</tr>
<tr>
<td>FESOP Permit No.:</td>
<td>F143-32451-00018</td>
</tr>
</tbody>
</table>

Please check what document is being certified:

- [ ] Annual Compliance Certification Letter
- [ ] Test Result (specify) ____________________________________________
- [ ] Report (specify) ______________________________________________
- [ ] Notification (specify) __________________________________________
- [ ] Affidavit (specify) _____________________________________________
- [ ] Other (specify) _______________________________________________

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

Signature:

Printed Name:

Title/Position:

Date:
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCurrence REPORT

Source Name: Ilpea Industries Inc.
Source Address: 1320 S. Main Street, Scottsburg, Indiana 47170
FESOP Permit No.: F143-32451-00018

This form consists of 2 pages

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
  • The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  • The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12.

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:
<table>
<thead>
<tr>
<th><strong>Date/Time Emergency started:</strong></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Date/Time Emergency was corrected:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Was the facility being properly operated at the time of the emergency?</strong></td>
<td>Y</td>
</tr>
<tr>
<td>Describe:</td>
<td></td>
</tr>
<tr>
<td><strong>Type of Pollutants Emitted:</strong> TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other:</td>
<td></td>
</tr>
<tr>
<td><strong>Estimated amount of pollutant(s) emitted during emergency:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Describe the steps taken to mitigate the problem:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Describe the corrective actions/response steps taken:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Describe the measures taken to minimize emissions:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:</strong></td>
<td></td>
</tr>
</tbody>
</table>

**Form Completed by:**

______________________________

**Title / Position:**

______________________________

**Date:**

______________________________

**Phone:**

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

**Source Name:** Ilpea Industries Inc.  
**Source Address:** 1320 S. Main Street, Scottsburg, Indiana 47170  
**FESOP Permit No.:** F143-32451-00018

<table>
<thead>
<tr>
<th>Months: ___________ to ____________ Year: ______________</th>
</tr>
</thead>
</table>

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

- [ ] NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
- [ ] THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Date of Deviation:</strong></td>
<td><strong>Duration of Deviation:</strong></td>
</tr>
<tr>
<td><strong>Number of Deviations:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Probable Cause of Deviation:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Response Steps Taken:</strong></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Date of Deviation:</strong></td>
<td><strong>Duration of Deviation:</strong></td>
</tr>
<tr>
<td><strong>Number of Deviations:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Probable Cause of Deviation:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Response Steps Taken:</strong></td>
<td></td>
</tr>
<tr>
<td>Permit Requirement (specify permit condition #)</td>
<td></td>
</tr>
<tr>
<td>------------------------------------------------</td>
<td>---</td>
</tr>
<tr>
<td>Date of Deviation:</td>
<td>Duration of Deviation:</td>
</tr>
<tr>
<td>Number of Deviations:</td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Deviation:</td>
<td>Duration of Deviation:</td>
</tr>
<tr>
<td>Number of Deviations:</td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Deviation:</td>
<td>Duration of Deviation:</td>
</tr>
<tr>
<td>Number of Deviations:</td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
</tr>
</tbody>
</table>

Form Completed by: ___________________________
Title / Position: ___________________________
Date: ___________________________
Phone: ___________________________
Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Description and Location

Source Name: Ilpea Industries, Inc.
Source Location: 1320 S Main Street, Scottsburg, Indiana 47170
County: Scott
SIC Code: 3053 (Gaskets, Packing, and Sealing Devices); 3099 (Primary Metal Products, N.E.C.)
Operation Permit No.: F143-32451-00018
Operation Permit Issuance Date: August 5, 2013
Significant Permit Revision No.: 143-41469-00018
Permit Reviewer: Alexandrea Neuzerling

Existing Approvals

The source was issued FESOP Renewal No. F143-32451-00018 on August 5, 2013. The source has since received the following approvals:

(a) Significant Permit Revision No. 143-34316-00018, issued on July 7, 2014;
(b) Significant Permit Revision No. 143-35175-00018, issued on April 7, 2015;
(c) Review Request No. 143-37099-00018, issued on May 9, 2016;
(d) Significant Permit Revision No. 143-37097-00018, issued on July 15, 2016;
(e) Significant Permit Revision No. 143-38265-00018, issued on June 27, 2017;
(f) Administrative Amendment No. 143-39190-00018, issued on November 29, 2017; and
(g) Significant Permit Revision No. 143-40532-00018, issued on February 27, 2019.

County Attainment Status

The source is located in Scott 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>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</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. Scott 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) PM$_{2.5}$
Scott County has been classified as attainment for PM$_{2.5}$. Therefore, direct PM$_{2.5}$, SO$_2$, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Scott 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 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_4q18.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.
Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits. 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>Source-Wide Emissions Prior to Revision (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>Total PTE of Entire Source Excluding Fugitive Emissions(^*)</td>
<td>160.96</td>
<td>92.71</td>
<td>92.71</td>
<td>0.07</td>
<td>12.26</td>
<td>7.97</td>
<td>10.30</td>
<td>1.76</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</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>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
</tr>
</tbody>
</table>

\(^1\) Under 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."

\(^2\) PM\(_{2.5}\) listed is direct PM\(_{2.5}\).

\(^*\) Fugitive HAP emissions are always included in the source-wide emissions.

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

(b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(c) These emissions are based on the TSD of FESOP Significant Permit Revision No. 143-40532-00018, issued on February 27, 2019.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Ilpea Industries, Inc. on May 20, 2019, relating to the following:

(1) Removing PM, PM\(_{10}\), and PM\(_{2.5}\) stack testing for the following since there is no consistent laminar air flow to allow for testing, and the results would be inaccurate and would not reflect the actual usage of the hoppers;

<table>
<thead>
<tr>
<th>Baghouse</th>
<th>Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>C-158 (exhausting indoors)</td>
<td>Weigh Hopper (EU158)</td>
</tr>
<tr>
<td>C-159 (exhausting indoors)</td>
<td>Weigh Hopper (EU-159)</td>
</tr>
</tbody>
</table>

(2) Changing existing emission unit descriptions that do not result in changes in maximum capacities and potential emissions;

(3) Changing the pressure drop threshold for an existing wet scrubber that currently controls 2 kilns; and

(4) Adding a dry scrubber that will eventually replace the existing wet scrubber; dry scrubber will have new compliance requirements.

The following is a list of the emission unit description changes:
(a) One (1) Ferrite Banbury mixer, constructed in 1999, approved modified in 2016 for modification to exhaust to the outdoors, identified as EU-122, with a maximum capacity of 3,700 lbs per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122.

(b) One (1) Strontium weigh hopper (#1), constructed in 2014, identified as EU-158, with a maximum capacity of 870 pounds of Strontium Carbonate per hour, using a baghouse for control, identified as C-158, and exhausting indoors.

(c) One (1) Strontium weigh hopper (#2), approved in 2014 for construction, identified as EU-159, with a maximum capacity of 870 pounds of Strontium Carbonate per hour, using a baghouse for control, identified as C-159, and exhausting indoors.

This hopper was originally approved in 2014 for construction; it was approved for construction extension in 2016 and again in 2019.

(d) One (1) Small rotary calcining kiln, constructed in 2014, identified as EU-101, approved in 2019 to change control, with a maximum capacity of 3,000 lbs of iron oxide mixture solids per hour and a maximum heat input capacity of 10.00 MMBtu/hr, using a wet scrubber (identified as C-101-2) as control until a new dry scrubber (identified as DS-101) is constructed, at which time wet scrubber C-101-2 will be removed, and exhausting to stack S-101-2.

(e) One (1) Large rotary calcining kiln, constructed in 2016, identified as EU-102, approved in 2019 to change control, with a maximum capacity of 3,500 lbs of iron oxide mixture solids per hour and a maximum heat input capacity of 10.00 MMBtu/hr, using a wet scrubber (C-102-2, approved in 2013 for construction, or until installation of scrubber C-102-2, emissions from EU-102 shall be controlled by identified as C-101-2) as control until a new dry scrubber (identified as DS-101) is constructed, at which time wet scrubber C-101-2 will be removed, and exhausting to stack S-101-2.

Iron Oxide (from silos) and Strontium Carbonate (bags) are fed into the kilns and heated to form iron clinkers. The clinkers are milled from large particle size to a very fine powder which is used to make magnetic plastic. The milled material is sent to the Banbury mixer so plastic material can be added to form a compound and extruded to form magnetic plastic strips and rolls for plastic magnets.

(f) One (1) Moritz Mill (#1), constructed in 2014, modified in 2017 to exhaust outdoors, identified as EU-152, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-152, and exhausting to stack S123.

(g) One (1) Moritz Mill (#2), constructed in 2014, modified in 2017 to exhaust outdoors, identified as EU-153, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-153, and exhausting to stack S124.

(h) One (1) Moritz Mill (#3), constructed in 2013, identified as EU-154, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-154, and exhausting to stack S125.

The above unit was originally approved in 2013 for construction, but The maximum capacity was revised from 2,380 lbs per hour to 1,700 lbs per hour in 2014. It was then approved for construction extension in 2016 and again in 2019.

(i) One (1) Ferrite twin ICMA banbury/extruder/mixer line, constructed in 2013, approved in 2016 to correct the maximum capacity, approved in 2017 for modification to increase the maximum capacity, identified as EU-123B, with a maximum capacity of 4,400 pounds per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122, and consisting of the following:
(1) One (1) 275-liter capacity mixer, and
(2) Two (2) twin banbury extruders/mixers

The banbury mixes powder metal and plastic together to form a magnetic compound. Ingredients used are chlorinated polyethylene, ethylene vinyl acetate, stearic acid, propylene based elastomer and epoxidized soybean oil.

The baghouse C-122 is a common control device used for twin banbury/extruder/mixer line EU-123B and Banbury Mixer EU-122.

(j) Five (5) plastic extrusion lines, each with a throughput of 300-400 lbs per hour, no control, and exhausting indoors.

### Enforcement Issues

IDEM is aware that there is a pending enforcement action for failing the stack test for EU-101/S-101-2. IDEM is reviewing this matter and will take the appropriate action.

### Emission Calculations

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

### Permit Level Determination – FESOP Significant Permit Revision

There are no new emission units as a result of this revision. See the "Description of Proposed Revision" section above for more detail.

Pursuant to 326 IAC 2-8-11.1(f)(1)(I), this FESOP is being revised through a FESOP Significant Permit Revision because of the following:

(a) The proposed revision is not an Administrative Amendment or Minor Permit Revision;
(b) The proposed revision removes significant testing requirements for existing units; and
(c) The proposed revision requires significant new compliance monitoring, testing, record keeping and reporting for the new control that will eventually replace an existing control.

### PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. 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.
Source-Wide Emissions After Issuance (ton/year)

<table>
<thead>
<tr>
<th></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>Total PTE of Entire Source Excluding Fugitives*</td>
<td>160.96</td>
<td>92.71</td>
<td>92.71</td>
<td>0.07</td>
<td>12.26</td>
<td>7.24</td>
<td>10.30</td>
<td>1.76</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</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>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
</tr>
</tbody>
</table>

1 Under 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.”
2 PM\(_{2.5}\) listed is direct PM\(_{2.5}\).
* Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

The source opted to keep their PM/PM\(_{10}\)/PM\(_{2.5}\) limits in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD), and 326 IAC 2-8 (FESOP) for more information regarding the limits.

(a) This existing Title V minor stationary source will continue to be minor under 326 IAC 2-7 because the potential to emit criteria pollutants and HAPs from the entire source will continue to be less than or limited to less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-8 (FESOP) and is an area source under Section 112 of the Clean Air Act (CAA).

(b) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the potential to emit of all PSD regulated pollutants from the entire source will continue to be less than or limited to less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

Due to the proposed revision, federal rule applicability has been reviewed as follows:

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

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

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

(a) 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 for this proposed revision.

**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 limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.
State Rule Applicability - Entire Source

Due to this revision, state rule applicability has been reviewed as follows:

326 IAC 2-2 (PSD)
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.

All PM/PM10/PM2.5 limits that are currently applied to the source will remain in effect even after the installation of the new dry scrubber (DS-101) for the kilns.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The emission units 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 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provision of 326 IAC 2-8 (FESOP).

All PM10/PM2.5 limits that are currently applied to the source will remain in effect even after the installation of the new dry scrubber (DS-101) for the kilns.

State Rule Applicability – Individual Facilities

There is no change in state rule applicability for individual facilities due to the proposed revision.

Compliance Determination and Monitoring Requirements

(a) The Compliance Determination Requirements applicable to this revision are as follows:

After installation of the dry scrubber (DS-101):

In order to comply with the PSD and FESOP minor limits, the dry scrubber (DS-101) for particulate control shall be in operation and control emissions from the rotary calcining kilns, identified as EU-101 and EU-102, at all time that the associated kiln(s) is/are in operation.

Testing Requirements:

(1) Existing Wet Scrubber:

The permit currently requires testing for the kilns and the wet scrubber.

<table>
<thead>
<tr>
<th>Emission Unit/Date of construction</th>
<th>Control Device</th>
<th>Date of Initial Valid Demonstration</th>
<th>Pollutant/Parameter</th>
<th>Frequency of Testing</th>
<th>Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-101 (2014)</td>
<td>C-101-2</td>
<td>February 19, 2019</td>
<td>PM/PM10/PM2.5</td>
<td>every 5 years</td>
<td>326 IAC 2-2, 326 IAC 2-8-4, 326 IAC 6-3-2</td>
</tr>
<tr>
<td>EU-102 (2016)</td>
<td>Wet scrubber</td>
<td></td>
<td>PM/PM2.5</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(2) After installation of the dry scrubber (DS-101):
Summary of Testing Requirements

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Control Device</th>
<th>Timeframe for Testing</th>
<th>Pollutant/ Parameter</th>
<th>Frequency of Testing</th>
<th>Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-101</td>
<td>DS-101</td>
<td>within 180 days after initial startup of DS-101</td>
<td>PM/PM10/PM2.5</td>
<td>every 5 years</td>
<td>326 IAC 2-2</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>326 IAC 2-8-4</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>326 IAC 6-3-2</td>
</tr>
</tbody>
</table>

(3) EU-158/C-158 and EU-159/C-159
Upon further evaluation, the stack testing associated with EU-158/C-158 and EU-159/C-159 will be removed from the permit, since there is no consistent laminar air flow to allow for testing, and the results would be inaccurate and would not reflect the actual usage of the hoppers.

(b) The Compliance Monitoring Requirements applicable to this proposed revision are as follows:

(1) Before removal of the wet scrubber (C-101-2):

<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>C-101-2</td>
<td>Pressure Drop</td>
<td>Daily</td>
<td>Within normal range of 15 to 30 inches of water, unless a different upper or lower value is established in the most recent compliant stack test</td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the wet scrubber, C-101-2, for the rotary kilns, EU-101 and EU-102 must operate properly to assure compliance with 326 IAC 2-2 (PSD), 326 IAC 2-8-4 (FESOP), and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

(2) After installation of the dry scrubber (DS-101):

<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>DS-101</td>
<td>Lime Injection Rate</td>
<td>Daily</td>
<td>At or above 8 kg/hr (133 mg/min) or the value established in the most recent compliant stack test</td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the dry scrubber, DS-101, for the rotary kilns, EU-101 and EU-102, must operate properly to assure compliance with 326 IAC 2-2 (PSD), 326 IAC 2-8-4 (FESOP), and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

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) Section A.2 and A.3 were updated to include revised emission unit descriptions:

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

The source consists of the following permitted emission units:

...
(b) One (1) Ferrite Banbury mixer, constructed in 1999, approved modified in 2016 for modification to exhaust to the outdoors, identified as EU-122, with a maximum capacity of 3,700 lbs per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122.

... 

(o) One (1) Strontium weigh hopper (#1), constructed in 2014, identified as EU-158, with a maximum capacity of 870 pounds of Strontium Carbonate per hour, using a baghouse for control, identified as C-158, and exhausting indoors.

(p) One (1) Strontium weigh hopper (#2), approved in 2014 for construction, identified as EU-159, with a maximum capacity of 870 pounds of Strontium Carbonate per hour, using a baghouse for control, identified as C-159, and exhausting indoors.

This hopper was originally approved in 2014 for construction; it was approved for construction extension in 2016 and again in 2019.

(q) One (1) Small rotary calcining kiln, constructed in 2014, identified as EU-101, approved in 2019 to change control, with a maximum capacity of 3,000 lbs of iron oxide mixture solids per hour and a maximum heat input capacity of 10.00 MMBtu/hr, using a wet scrubber (identified as C-101-2) as control until a new dry scrubber (identified as DS-101) is constructed, at which time wet scrubber C-101-2 will be removed, and exhausting to stack S-101-2.

(r) One (1) Large rotary calcining kiln, constructed in 2016, identified as EU-102, approved in 2019 to change control, with a maximum capacity of 3,500 lbs of iron oxide mixture solids per hour and a maximum heat input capacity of 10.00 MMBtu/hr, using a wet scrubber (C-102-2, approved in 2013 for construction, or until installation of scrubber C-102-2, emissions from EU-102 shall be controlled by identified as C-101-2) as control until a new dry scrubber (identified as DS-101) is constructed, at which time wet scrubber C-101-2 will be removed, and exhausting to stack S-101-2.

Iron Oxide (from silos) and Strontium Carbonate (bags) are fed into the kilns and heated to form iron clinkers. The clinkers are milled from large particle size to a very fine powder which is used to make magnetic plastic. The milled material is sent to the Banbury mixer so plastic material can be added to form a compound and extruded to form magnetic plastic strips and rolls for plastic magnets.

(s) One (1) Moritz Mill (#1), constructed in 2014, modified in 2017 to exhaust outdoors, identified as EU-152, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-152, and exhausting to stack S123.

(t) One (1) Moritz Mill (#2), constructed in 2014, modified in 2017 to exhaust outdoors, identified as EU-153, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-153, and exhausting to stack S124.

(u) One (1) Moritz Mill (#3), constructed in 2013, identified as EU-154, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-154, and exhausting to stack S125.

The above unit was originally approved in 2013 for construction, but the maximum capacity was revised from 2,380 lbs per hour to 1,700 lbs per hour in 2014. It was then approved for construction extension in 2016 and again in 2019.

(v) One (1) Ferrite twin ICMA banbury/extruder/mixer line, constructed in 2013, approved in 2016 to correct the maximum capacity, approved in 2017 for modification to increase the maximum capacity, identified as EU-123B, with a maximum capacity of 4,400 pounds per
hour, using a baghouse for control, identified as C-122, exhausting to stack S-122, and consisting of the following:

1. One (1) 275-liter capacity mixer, and
2. Two (2) twin banbury extruders/mixers

The banbury mixes powder metal and plastic together to form a magnetic compound. Ingredients used are chlorinated polyethylene, ethylene vinyl acetate, stearic acid, propylene based elastomer and epoxidized soybean oil.

The baghouse C-122 is a common control device used for twin banbury/extruder/mixer line EU-123B and Banbury Mixer EU-122.

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

The source also consists of the following insignificant activities:

- Five (5) One (1) plastic extrusion lines, each with a throughput of 300-400 lbs per hour, no control, and exhausting indoors.

### (2) The D.1 Section Description Box was updated to include revised emission unit descriptions:

#### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

<table>
<thead>
<tr>
<th>Emissions Unit Description:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(b) One (1) Ferrite Banbury mixer, constructed in 1999, approved modified in 2016 for modification to exhaust to the outdoors, identified as EU-122, with a maximum capacity of 3,700 lbs per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122.</td>
</tr>
<tr>
<td>(o) One (1) Strontium weigh hopper (#1), constructed in 2014, identified as EU-158, with a maximum capacity of 870 pounds of Strontium Carbonate per hour, using a baghouse for control, identified as C-158, and exhausting indoors.</td>
</tr>
<tr>
<td>(p) One (1) Strontium weigh hopper (#2), approved in 2014 for construction, identified as EU-159, with a maximum capacity of 870 pounds of Strontium Carbonate per hour, using a baghouse for control, identified as C-159, and exhausting indoors.</td>
</tr>
<tr>
<td>(q) One (1) Small rotary calcining kiln, constructed in 2014, identified as EU-101, approved in 2019 to change control, with a maximum capacity of 3,000 lbs of iron oxide mixture solids per hour and a maximum heat input capacity of 10.00 MMBtu/hr, using a wet scrubber (identified as C-101-2) as control until a new dry scrubber (identified as DS-101) is constructed, at which time wet scrubber C-101-2 will be removed, and exhausting to stack S-101-2.</td>
</tr>
<tr>
<td>(r) One (1) Large rotary calcining kiln, constructed in 2016, identified as EU-102, approved in 2019 to change control, with a maximum capacity of 3,500 lbs of iron oxide mixture solids per hour and a maximum heat input capacity of 10.00 MMBtu/hr, using a wet scrubber (C-102-2, approved in 2013 for construction, or until installation of scrubber C-102-2, emissions from EU-102 shall be controlled by identified as C-101-2 as control until a new dry scrubber (identified as DS-101) is constructed, at which time wet scrubber C-101-2 will be removed, and exhausting to stack S-101-2.</td>
</tr>
</tbody>
</table>
Iron Oxide (from silos) and Strontium Carbonate (bags) are fed into the kilns and heated to form iron clinkers. The clinkers are milled from large particle size to a very fine powder which is used to make magnetic plastic. The milled material is sent to the Banbury mixer so plastic material can be added to form a compound and extruded to form magnetic plastic strips and rolls for plastic magnets.

(s) One (1) Moritz Mill (#1), constructed in 2014, modified in 2017 to exhaust outdoors, identified as EU-152, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-152, and exhausting to stack S123.

(t) One (1) Moritz Mill (#2), constructed in 2014, modified in 2017 to exhaust outdoors, identified as EU-153, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-153, and exhausting to stack S124.

(u) One (1) Moritz Mill (#3), constructed in 2013, identified as EU-154, with a maximum capacity of 1,700 lbs per hour, using a baghouse for control, identified as C-154, and exhausting to stack S125.

The above unit was originally approved in 2013 for construction, but the maximum capacity was revised from 2,380 lbs per hour to 1,700 lbs per hour in 2014. It was then approved for construction extension in 2016 and again in 2019.

(v) One (1) Ferrite twin ICMA banbury/extruder/mixer line, constructed in 2013, approved in 2016 to correct the maximum capacity, approved in 2017 for modification to increase the maximum capacity, identified as EU-123B, with a maximum capacity of 4,400 pounds per hour, using a baghouse for control, identified as C-122, exhausting to stack S-122, and consisting of the following:

1. One (1) 275- liter capacity mixer,
2. Two (2) twin banbury extruders/mixers

The banbury mixes powder metal and plastic together to form a magnetic compound. Ingredients used are chlorinated polyethylene, ethylene vinyl acetate, stearic acid, propylene based elastomer and epoxidized soybean oil.

The baghouse C-122 is a common control device used for twin banbury/extruder/mixer line EU-123B and Banbury Mixer EU-122.

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

(3) Condition D.1.1, D.1.2, and D.1.5 were updated to include the future dry scrubber DS-101:

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

D.1.1 PM PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

(a) The PM emissions after control from each unit listed in the table below shall not exceed the values shown:

<table>
<thead>
<tr>
<th>Control Device</th>
<th>Emission Units</th>
<th>PM Limitations (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>C-101-2 (exhausting to S101-2) or DS-101 (exhausting to S101-2)</td>
<td>Powder metal calcining process (kiln EU-101 and/or EU-102)</td>
<td>11.35</td>
</tr>
</tbody>
</table>
Control Device | Emission Units | PM Limitations (lb/hr)
--- | --- | ---
C-152 (exhausting Stack S123) | Moritz Mill (EU-152) | 3.68
C-153 (exhausting Stack S124) | Moritz Mill (EU-153) | 3.68
C-154 (exhausting Stack S125) | Moritz Mill (EU-154) | 3.68
C-156 (exhausting Stack S-156) | Iron Oxide Silo (EU-103), Weigh Hopper EU-156, Weigh Hopper EU-157 | 1.19
C-157 (exhausting Stack S-157) | Iron Oxide Silo (EU-105) | 1.19
C-158 (exhausting indoors) | Weigh Hopper (EU158) | 4.30
C-159 (exhausting indoors) | Weigh Hopper (EU-159) | 4.30
C-122 (Stack S-122) | Banbury Mixer (EU-122) | 1.05

(b) The Permittee shall operate only one (1) kiln (EU-101 or EU-102) at a time, until the dry scrubber (DS-101) begins operation, at which time both kilns may run simultaneously or separately.

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

D.1.2 Particulate Matter Less Than 10 Microns (PM10) and PM2.5 [326 IAC 2-2][326 IAC 2-8-4]
Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

(a) The PM10 and PM2.5 emissions after control from each unit listed in the table below shall not exceed the values shown:

Control Device | Emission Units | PM10 Limitations (lb/hr) | PM2.5 Limitations (lb/hr)
--- | --- | --- | ---
C-101-2 (exhausting to S101-2) or DS-101 (exhausting to S101-2) | Powder metal calcining process (kiln EU-101 and/or EU-102) | 2.06 | 2.06
C-152 (exhausting Stack S123) | Moritz Mill (EU-152) | 3.68 | 3.68
C-153 (exhausting Stack S124) | Moritz Mill (EU-153) | 3.68 | 3.68
C-154 (exhausting Stack S125) | Moritz Mill (EU-154) | 3.68 | 3.68
C-156 (exhausting Stack S-156) | Iron Oxide Silo (EU-103), Weigh Hopper EU-156, Weigh Hopper EU-157 | 1.19 | 1.19
C-157 (exhausting Stack S-157) | Iron Oxide Silo (EU-105) | 1.19 | 1.19
C-158 (exhausting indoors) | Weigh Hopper (EU158) | 1.55 | 1.55
C-159 (exhausting indoors) | Weigh Hopper (EU-159) | 1.55 | 1.55
C-122 (Stack S-122) | Banbury Mixer (EU-122) | 1.05 | 1.05

(b) The Permittee shall operate only one (1) kiln (EU-101 or EU-102) at a time, until the dry scrubber (DS-101) begins operation, at which time both kilns may run simultaneously or separately.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.
Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.5 Particulate Control

(a) In order to comply with Conditions D.1.1, D.1.2, and D.1.3, either the wet scrubber(s), C-101-2, or the dry scrubber, DS-101, for particulate control shall be in operation and control emissions from the rotary calcining kilns, identified as EU-101 and EU-102, at all times that the associated kiln(s) is/are in operation.

(4) Condition D.1.6 was updated to include the new dry scrubber DS-101 as well as remove stack testing requirements for EU-158 and EU-159:

D.1.6 Testing Requirements [326 IAC 2-1.1-11]

(b) In order to demonstrate the compliance status with Conditions D.1.1, D.1.2, and D.1.3, not later than one hundred and eighty (180) days after initial startup of each rotary calcining kilns (EU-101 and EU-102):

(i) The Permittee shall conduct PM, PM10, and PM2.5 testing for each of the two rotary calcining kilns (EU-101 and EU-102) after its control (wet scrubber), utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

(ii) No later than one hundred and eighty (180) days after initial startup of the dry scrubber (DS-101), the Permittee shall conduct PM, PM10, and PM2.5 testing for each of the two rotary calcining kilns (EU-101 and EU-102) after its control (dry scrubber), utilizing methods as approved by the Commissioner. These tests shall be repeated at least once ever five (5) years from the date of the most recent valid compliance demonstration.

(iii) The Permittee shall conduct the PM, PM10, and PM2.5 testing specified in either Condition D.1.6(b)(i) or Condition D.1.6(b)(ii), whichever occurs first.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee’s obligations with regard to the performance testing required by this condition.

PM10 and PM2.5 includes filterable and condensable PM.

(c) In order to demonstrate the compliance status with Conditions D.1.1, D.1.2, and D.1.3, not later than one hundred and eighty (180) days after initial startup of the following, the Permittee shall conduct PM, PM10, and PM2.5 testing:

<table>
<thead>
<tr>
<th>Baghouse</th>
<th>Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>C-158 (exhausting indoors)</td>
<td>Weigh Hopper (EU-158)</td>
</tr>
<tr>
<td>C-159 (exhausting indoors)</td>
<td>Weigh Hopper (EU-159)</td>
</tr>
<tr>
<td>C-122 (Stack S-122)</td>
<td>Banbury Mixer (EU-122)</td>
</tr>
</tbody>
</table>

utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.
Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligations with regard to the performance testing required by this condition.

PM10 and PM2.5 includes filterable and condensable PM.

(5) Condition D.1.8 was revised to update the pressure drop range as well as add monitoring conditions for the dry scrubber DS-101:

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

**D.1.8 Parametric Monitoring**

(b) **Wet Scrubber**

The Permittee shall record the pressure drop and flow rate across each the wet scrubber used in conjunction with the rotary calcining kiln(s), at least once per day when the associated kiln(s) is/are in operation.

When for any one reading, the pressure drop across the scrubber is outside the normal range of 15 and 21 to 30 inches of water, or a range established during the latest stack test, the Permittee shall take reasonable response steps. Failure to take response steps shall be considered a deviation from this permit. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

When for any one reading, the flow rate of any of the scrubber is less than the minimum of 55 gallons per minute, or a minimum established during the latest stack test, the Permittee shall take reasonable response steps. Failure to take response steps shall be considered a deviation from this permit. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

A pressure reading that is outside the above mention range or a flow rate that is below the above mentioned minimum is not a deviation from this permit, the Permittee shall take reasonable response steps. Failure to take response steps shall be considered a deviation from this permit. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

(c) **Dry Scrubber**

The Permittee shall record the lime injection flow rate across the dry scrubber, DS-101 used in conjunction with the rotary calcining kiln(s), at least once per day when the associated kiln(s) is/are in operation.

When for any one reading, the flow rate of the dry scrubber, DS-101, is less than the minimum of 8 kilograms per hour (or 133 milligrams per minute), or a minimum established during the latest stack test, the Permittee shall take reasonable response steps. Failure to take response steps shall be considered a deviation
from this permit. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

(6) Condition D.1.11 was revised to include record keeping requirements for the new dry scrubber:

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

D.1.11 Record Keeping Requirements

(c) To document the compliance status with Condition D.1.98(b), the Permittee shall maintain daily records of the following operational parameters for the wet scrubber associated with each rotary calcining kiln during normal operation:

   (1) pressure drop; and
   (2) flow rate.

The Permittee shall include in its daily record when a pressure drop or a flow rate reading is not taken and the reason for the lack of a pressure drop or flow rate reading (e.g., the process did not operate that day).

(d) To document the compliance status with Condition D.1.8(c), the Permittee shall maintain daily records of the lime injection rate for the dry scrubber DS-101 associated with the rotary kilns during normal operation. The Permittee shall include in its daily record when an injection rate reading is not taken and the reason for the lack of injection rate reading (e.g., the process did not operate that day).

(de) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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 May 20, 2019.

The operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 143-41469-00018. The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Alexandrea Neuzerling, 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) 232-6634 or (800) 451-6027, and ask for Alexandrea Neuzerling or (317) 232-6634.

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

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

**PTE Summary (with Wet Scrubber C-101-2 on Kilns)**

**Company Name:** Ilpea Industries, Inc.  
**Source Location:** 1320 S Main Street, Scottsburg, Indiana 47170  
**Operating Permit Number:** F143-32451-00018  
**Significant Permit Revision Number:** 143-41469-00018  
**Reviewer:** Alexandrea Neuzerling

#### Uncontrolled Potential to Emit (tons/yr)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th><strong>PM</strong></th>
<th><strong>PM10</strong></th>
<th><strong>PM2.5</strong></th>
<th><strong>SO₂</strong></th>
<th><strong>NOₓ</strong></th>
<th><strong>VOC</strong></th>
<th><strong>CO</strong></th>
<th><strong>Total HAPs</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Silo - EU-106</td>
<td>0.27</td>
<td>0.27</td>
<td>0.27</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Silo - EU-107</td>
<td>0.27</td>
<td>0.27</td>
<td>0.27</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Silo - EU-108</td>
<td>0.40</td>
<td>0.40</td>
<td>0.40</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Twin Banbury/Extruder Mixer Line - EU-123B</td>
<td>250.54</td>
<td>250.54</td>
<td>250.54</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-112</td>
<td>0.25</td>
<td>0.25</td>
<td>0.25</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2.30</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-113</td>
<td>4.91E-02</td>
<td>4.91E-02</td>
<td>4.91E-02</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.46</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-114</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.79</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-115</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.79</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-116</td>
<td>0.11</td>
<td>0.11</td>
<td>0.11</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.99</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-117</td>
<td>0.11</td>
<td>0.11</td>
<td>0.11</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.99</td>
</tr>
<tr>
<td>Silo - EU-103</td>
<td>27.51</td>
<td>9.64</td>
<td>9.64</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Silo - EU-105</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Weigh Hopper - EU-156</td>
<td>21.0E-02</td>
<td>1.23E-02</td>
<td>1.23E-02</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Weigh Hopper - EU-157</td>
<td>21.0E-02</td>
<td>1.23E-02</td>
<td>1.23E-02</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cibec Mixer - EU-123C</td>
<td>4.17</td>
<td>2.09</td>
<td>2.09</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cibec Mixer - EU-125</td>
<td>4.17</td>
<td>2.09</td>
<td>2.09</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Weigh Hopper - EU-158</td>
<td>113.88</td>
<td>113.88</td>
<td>113.88</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Weigh Hopper - EU-159</td>
<td>113.88</td>
<td>113.88</td>
<td>113.88</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rotary Kilns - Process Emissions - EU-101</td>
<td>854.10</td>
<td>854.10</td>
<td>854.10</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.71</td>
</tr>
<tr>
<td>Rotary Kilns - Process Emissions - EU-102</td>
<td>996.45</td>
<td>996.45</td>
<td>996.45</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.82</td>
</tr>
<tr>
<td>Rotary Kilns - Natural Gas Combustion - EU-101 and EU-102</td>
<td>0.16</td>
<td>0.65</td>
<td>0.65</td>
<td>5.15E-02</td>
<td>8.59</td>
<td>0.47</td>
<td>7.21</td>
<td>0.16</td>
</tr>
<tr>
<td>Mortiz Mills - EU-152</td>
<td>109.50</td>
<td>109.50</td>
<td>109.50</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mortiz Mills - EU-153</td>
<td>109.50</td>
<td>109.50</td>
<td>109.50</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mortiz Mill - EU-154</td>
<td>109.50</td>
<td>109.50</td>
<td>109.50</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>6.98E-02</td>
<td>0.28</td>
<td>0.28</td>
<td>2.21E-02</td>
<td>3.68</td>
<td>0.20</td>
<td>3.09</td>
<td>6.94E-02</td>
</tr>
<tr>
<td>Plastic extrusion lines</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>2,905.77</td>
<td>2,884.41</td>
<td>2,884.41</td>
<td>7.36E-02</td>
<td>12.26</td>
<td>7.24</td>
<td>10.30</td>
<td>1.76</td>
</tr>
</tbody>
</table>

**Notes:**
1. PM2.5 listed is direct PM2.5
2. Bottlenecked PTE for powder metal processes
## Appendix A: Emission Calculations

**PTE Summary (with Wet Scrubber C-101-2 on Kilns)**

### Company Name: Specs Industries, Inc.

### Source Location: 1320 S Main Street, Scottsburg, Indiana 47170

### Operating Permit Number: F143-32451-00018

### Significant Permit Revision Number: 143-41469-00018

### Reviewer: Alexandrea Neuzerling

### Potential to Emit after Control (tons/yr)

<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>
</tr>
</thead>
<tbody>
<tr>
<td>Silo - EU-106</td>
<td>0.27</td>
<td>0.27</td>
<td>0.27</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Silo - EU-107</td>
<td>0.27</td>
<td>0.27</td>
<td>0.27</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Silo - EU-108</td>
<td>0.40</td>
<td>0.40</td>
<td>0.40</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Banbury Mixer - EU-122</td>
<td>2.11</td>
<td>2.11</td>
<td>2.11</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Twin Banbury/Extruder Mixer Line - EU-123B</td>
<td>2.51</td>
<td>2.51</td>
<td>2.51</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-112</td>
<td>0.25</td>
<td>0.25</td>
<td>0.25</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2.30</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-113</td>
<td>4.91E-02</td>
<td>4.91E-02</td>
<td>4.91E-02</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.46</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-115</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td></td>
<td></td>
<td>0.79</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-116</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td></td>
<td></td>
<td>0.79</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-117</td>
<td>0.11</td>
<td>0.11</td>
<td>0.11</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.99</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-118</td>
<td>0.11</td>
<td>0.11</td>
<td>0.11</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.99</td>
</tr>
<tr>
<td>Silo - EU-103*</td>
<td>7.80E-02</td>
<td>4.29E-02</td>
<td>4.29E-02</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Silo - EU-105*</td>
<td>2.10E-02</td>
<td>1.23E-02</td>
<td>1.23E-02</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Weigh Hopper - EU-156*</td>
<td>2.10E-02</td>
<td>1.23E-02</td>
<td>1.23E-02</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cibec Mixer - EU123C</td>
<td>4.17</td>
<td>2.09</td>
<td>2.09</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cibec Mixer - EU125</td>
<td>4.17</td>
<td>2.09</td>
<td>2.09</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Weigh Hopper - EU158</td>
<td>3.39</td>
<td>3.39</td>
<td>3.39</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Weigh Hopper - EU159</td>
<td>3.39</td>
<td>3.39</td>
<td>3.39</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rotary Kilns - Process Emissions - EU-101</td>
<td>7.69</td>
<td>1.83</td>
<td>1.83</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.71</td>
</tr>
<tr>
<td>Rotary Kilns - Process Emissions - EU-102</td>
<td>8.97</td>
<td>2.14</td>
<td>2.14</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.82</td>
</tr>
<tr>
<td>Rotary Kilns - Natural Gas Combustion - EU-101 and EU-102</td>
<td>0.16</td>
<td>0.65</td>
<td>0.65</td>
<td>5.15E-02</td>
<td>8.59</td>
<td>0.47</td>
<td>7.21</td>
<td>0.16</td>
</tr>
<tr>
<td>Moritz Mills - EU-152</td>
<td>1.10</td>
<td>1.10</td>
<td>1.10</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Moritz Mills - EU-153</td>
<td>1.10</td>
<td>1.10</td>
<td>1.10</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Moritz Mill - EU-154</td>
<td>1.10</td>
<td>1.10</td>
<td>1.10</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>6.56E-02</td>
<td>0.28</td>
<td>0.28</td>
<td>2.21E-02</td>
<td>3.68</td>
<td>0.20</td>
<td>3.09</td>
<td>6.94E-02</td>
</tr>
<tr>
<td>Plastic extrusion lines</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.26</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>41.66</td>
<td>25.45</td>
<td>25.45</td>
<td>7.36E-02</td>
<td>12.26</td>
<td>7.24</td>
<td>10.30</td>
<td>1.76</td>
</tr>
</tbody>
</table>

**Notes:**

1. PM2.5 listed is direct PM2.5
2. Bottlenecked PTE for powder metal processes
## Appendix A: Emission Calculations

### PTE Summary (with Wet Scrubber C-101-2 on Kilns)

**Company Name:** Spex Industries, Inc.  
**Source Location:** 1320 S Main Street, Scottsburg, Indiana 47170  
**Operating Permit Number:** F143-32451-00018  
**Significant Permit Revision Number:** 143-41469-00018  
**Reviewer:** Alexandrea Neuzerling

### Potential to Emit after Issuance (tons/yr)

<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>
</tr>
</thead>
<tbody>
<tr>
<td>Silo - EU-106</td>
<td>0.27</td>
<td>0.27</td>
<td>0.27</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Silo - EU-107</td>
<td>0.27</td>
<td>0.27</td>
<td>0.27</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Silo - EU-108</td>
<td>0.40</td>
<td>0.40</td>
<td>0.40</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Banbury Mixer - EU-122</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Twin Banbury/Extruder Mixer Line - EU-123B</td>
<td>4.61</td>
<td>4.61</td>
<td>4.61</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-112</td>
<td>0.25</td>
<td>0.25</td>
<td>0.25</td>
<td>-</td>
<td>-</td>
<td>2.30</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-113</td>
<td>4.91E-02</td>
<td>4.91E-02</td>
<td>4.91E-02</td>
<td>-</td>
<td>-</td>
<td>0.46</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-115</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td>-</td>
<td>-</td>
<td>0.79</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-116</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td>-</td>
<td>-</td>
<td>0.79</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-117</td>
<td>0.11</td>
<td>0.11</td>
<td>0.11</td>
<td>-</td>
<td>-</td>
<td>0.99</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Silo - EU-103, Weigh Hopper EU-156, Weigh Hopper EU-157</td>
<td>5.21</td>
<td>5.21</td>
<td>5.21</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Silo - EU-105</td>
<td>5.21</td>
<td>5.21</td>
<td>5.21</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Cibec Mixer - EU123C</td>
<td>4.17</td>
<td>2.09</td>
<td>2.09</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Cibec Mixer - EU125</td>
<td>4.17</td>
<td>2.09</td>
<td>2.09</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Weigh Hopper - EU158</td>
<td>18.83</td>
<td>6.79</td>
<td>6.79</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Weigh Hopper - EU-159</td>
<td>18.83</td>
<td>6.79</td>
<td>6.79</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Rotary Kilns - Process Emissions - EU-101</td>
<td>49.71</td>
<td>9.02</td>
<td>9.02</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.71</td>
<td>-</td>
</tr>
<tr>
<td>Rotary Kilns - Process Emissions - EU-102</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Rotary Kilns - Natural Gas Combustion - EU-101 and EU-102</td>
<td>0.16</td>
<td>0.65</td>
<td>0.65</td>
<td>5.15E-02</td>
<td>8.59</td>
<td>0.47</td>
<td>7.21</td>
<td>0.16</td>
</tr>
<tr>
<td>Moritz Mills - EU-152</td>
<td>16.12</td>
<td>16.12</td>
<td>16.12</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Moritz Mills - EU-153</td>
<td>16.12</td>
<td>16.12</td>
<td>16.12</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Moritz Mill - EU-154</td>
<td>16.12</td>
<td>16.12</td>
<td>16.12</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>6.98E-02</td>
<td>0.28</td>
<td>0.28</td>
<td>2.21E-02</td>
<td>3.68</td>
<td>0.20</td>
<td>3.09</td>
<td>6.94E-02</td>
</tr>
<tr>
<td>Plastic extrusion lines</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

| Total | 160.96 | 92.71 | 92.71 | 7.36E-02 | 12.26 | 7.24 | 10.30 | 1.76 |

**Notes:**
1. The shaded cells indicate where limits are included.
2. PM2.5 listed is direct PM2.5.
### Appendix A: Emission Calculations

**PTE Summary (with Dry Scrubber DS-101 on Kilns)**

**Company Name:** Ilpea Industries, Inc.
**Source Location:** 1320 S Main Street, Scottsburg, Indiana 47170
**Operating Permit Number:** F143-32451-00018
**Significant Permit Revision Number:** 143-41469-00018
**Reviewer:** Alexandrea Neuzerling

<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>
</tr>
</thead>
<tbody>
<tr>
<td>Silo - EU-106</td>
<td>0.27</td>
<td>0.27</td>
<td>0.27</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Silo - EU-107</td>
<td>0.27</td>
<td>0.27</td>
<td>0.27</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Silo - EU-108</td>
<td>0.40</td>
<td>0.40</td>
<td>0.40</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Banbury Mixer - EU-122</td>
<td>210.68</td>
<td>210.68</td>
<td>210.68</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Twin Banbury/Extruder Mixer Line - EU-123B</td>
<td>250.54</td>
<td>250.54</td>
<td>250.54</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-112</td>
<td>0.25</td>
<td>0.25</td>
<td>0.25</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2.30</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-113</td>
<td>4.91E-02</td>
<td>4.91E-02</td>
<td>4.91E-02</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.46</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-114</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.79</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-115</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.79</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-117</td>
<td>0.11</td>
<td>0.11</td>
<td>0.11</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.99</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-118</td>
<td>0.11</td>
<td>0.11</td>
<td>0.11</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.99</td>
</tr>
<tr>
<td>Silo - EU-103</td>
<td>27.51</td>
<td>9.64</td>
<td>9.64</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Silo - EU-105</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Weigh Hopper - EU-156</td>
<td>2.10E-02</td>
<td>1.23E-02</td>
<td>1.23E-02</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Weigh Hopper - EU-157</td>
<td>2.10E-02</td>
<td>1.23E-02</td>
<td>1.23E-02</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cibec Mixer - EU123C</td>
<td>4.17</td>
<td>2.09</td>
<td>2.09</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cibec Mixer - EU125</td>
<td>4.17</td>
<td>2.09</td>
<td>2.09</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Weigh Hopper - EU158</td>
<td>113.88</td>
<td>113.88</td>
<td>113.88</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Weigh Hopper - EU159</td>
<td>113.88</td>
<td>113.88</td>
<td>113.88</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rotary Kilns - Process Emissions - EU-101</td>
<td>854.10</td>
<td>854.10</td>
<td>854.10</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.71</td>
</tr>
<tr>
<td>Rotary Kilns - Process Emissions - EU-102</td>
<td>996.45</td>
<td>996.45</td>
<td>996.45</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.82</td>
</tr>
<tr>
<td>Rotary Kilns - Natural Gas Combustion - EU-101 and EU-102</td>
<td>0.16</td>
<td>0.65</td>
<td>0.65</td>
<td>5.15E-02</td>
<td>8.59</td>
<td>0.47</td>
<td>7.21</td>
<td>0.16</td>
</tr>
<tr>
<td>Mortiz Mills - EU-152</td>
<td>109.50</td>
<td>109.50</td>
<td>109.50</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mortiz Mills - EU-153</td>
<td>109.50</td>
<td>109.50</td>
<td>109.50</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mortiz Mill - EU-154</td>
<td>109.50</td>
<td>109.50</td>
<td>109.50</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>6.94E-02</td>
<td>0.28</td>
<td>0.28</td>
<td>2.21E-02</td>
<td>3.68</td>
<td>0.20</td>
<td>3.09</td>
<td>6.94E-02</td>
</tr>
<tr>
<td>Plastic extrusion lines</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>2,905.77</td>
<td>2,884.41</td>
<td>2,884.41</td>
<td>7.36E-02</td>
<td>12.26</td>
<td>7.24</td>
<td>10.30</td>
<td>1.76</td>
</tr>
</tbody>
</table>

**Notes:**

1. PM2.5 listed is direct PM2.5
2. Bottlenecked PTE for powder metal processes
### Appendix A: Emission Calculations

**PTE Summary (with Dry Scrubber DS-101 on Kilns)**

**Company Name:** Ilpea Industries, Inc.  
**Source Location:** 1320 S Main Street, Scottsburg, Indiana 47170  
**Operating Permit Number:** F143-32451-00018  
**Significant Permit Revision Number:** 143-41469-00018  
**Reviewer:** Alexandrea Neuzerling

#### Potential to Emit after Control (tons/yr)

<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>
</tr>
</thead>
<tbody>
<tr>
<td>Silo - EU-106</td>
<td>0.27</td>
<td>0.27</td>
<td>0.27</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Silo - EU-107</td>
<td>0.27</td>
<td>0.27</td>
<td>0.27</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Silo - EU-108</td>
<td>0.40</td>
<td>0.40</td>
<td>0.40</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Banbury Mixer - EU-122</td>
<td>2.11</td>
<td>2.11</td>
<td>2.11</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Twin Banbury/Extruder Mixer Line - EU-123B</td>
<td>2.51</td>
<td>2.51</td>
<td>2.51</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-112</td>
<td>0.25</td>
<td>0.25</td>
<td>0.25</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>2.30</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-113</td>
<td>4.91E-02</td>
<td>4.91E-02</td>
<td>4.91E-02</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.46</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-115</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.79</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-116</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.79</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-117</td>
<td>0.11</td>
<td>0.11</td>
<td>0.11</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.99</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-118</td>
<td>0.11</td>
<td>0.11</td>
<td>0.11</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.99</td>
</tr>
<tr>
<td>Silo - EU-103*</td>
<td>7.80E-02</td>
<td>4.29E-02</td>
<td>4.29E-02</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Silo - EU-105*</td>
<td>2.10E-02</td>
<td>1.23E-02</td>
<td>1.23E-02</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Weigh Hopper - EU-101</td>
<td>2.10E-02</td>
<td>1.23E-02</td>
<td>1.23E-02</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Cibec Mixer - EU123C</td>
<td>4.17</td>
<td>2.09</td>
<td>2.09</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Cibec Mixer - EU125</td>
<td>4.17</td>
<td>2.09</td>
<td>2.09</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Weigh Hopper - EU158</td>
<td>3.39</td>
<td>3.39</td>
<td>3.39</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Weigh Hopper - EU159</td>
<td>3.39</td>
<td>3.39</td>
<td>3.39</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Rotary Kilns - Process Emissions - EU-101</td>
<td>5.84</td>
<td>2.04</td>
<td>2.04</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.71</td>
</tr>
<tr>
<td>Rotary Kilns - Process Emissions - EU-102</td>
<td>9.96</td>
<td>2.38</td>
<td>2.38</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.82</td>
</tr>
<tr>
<td>Rotary Kilns - Natural Gas Combustion - EU-101 and EU-102</td>
<td>0.16</td>
<td>0.65</td>
<td>0.65</td>
<td>5.15E-02</td>
<td>8.59</td>
<td>0.47</td>
<td>7.21</td>
<td>0.16</td>
</tr>
<tr>
<td>Moritz Mills - EU-152</td>
<td>1.10</td>
<td>1.10</td>
<td>1.10</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Moritz Mills - EU-153</td>
<td>1.10</td>
<td>1.10</td>
<td>1.10</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Moritz Mill - EU-154</td>
<td>1.10</td>
<td>1.10</td>
<td>1.10</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>6.98E-02</td>
<td>0.28</td>
<td>0.28</td>
<td>2.21E-02</td>
<td>3.68</td>
<td>0.20</td>
<td>3.09</td>
<td>6.94E-02</td>
</tr>
<tr>
<td>Plastic extrusion lines</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

**Total** | 43.51 | 25.89 | 25.89 | 7.36E-02 | 12.26 | 7.24 | 10.30 | 1.76 |

**Notes:**
1. PM2.5 listed is direct PM2.5
2. Bottlenecked PTE for powder metal processes
## Appendix A: Emission Calculations

### PTE Summary (with Dry Scrubber DS-101 on Kilns)

**Company Name:** Ilpea Industries, Inc.  
**Source Location:** 1320 S Main Street, Scottsburg, Indiana 47170  
**Operating Permit Number:** F143-32451-00018  
**Significant Permit Revision Number:** 143-41469-00018  
**Reviewer:** Alexandrea Neuzerling

### Potential to Emit after Issuance (tons/yr)

<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>
</tr>
</thead>
<tbody>
<tr>
<td>Silo - EU-106</td>
<td>0.27</td>
<td>0.27</td>
<td>0.27</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Silo - EU-107</td>
<td>0.27</td>
<td>0.27</td>
<td>0.27</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Silo - EU-108</td>
<td>0.40</td>
<td>0.40</td>
<td>0.40</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Banbury Mixer - EU-122</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Twin Banbury/Extruder Mixer Line - EU-123B</td>
<td>4.61</td>
<td>4.61</td>
<td>4.61</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-112</td>
<td>0.25</td>
<td>0.25</td>
<td>0.25</td>
<td>-</td>
<td>-</td>
<td>2.30</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-113</td>
<td>4.91E-02</td>
<td>4.91E-02</td>
<td>4.91E-02</td>
<td>-</td>
<td>-</td>
<td>0.46</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-114</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td>-</td>
<td>-</td>
<td>0.79</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-115</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td>8.41E-02</td>
<td>-</td>
<td>-</td>
<td>0.79</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-116</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.99</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Plastic Pellet Production Line - EU-117</td>
<td>0.11</td>
<td>0.11</td>
<td>0.11</td>
<td>-</td>
<td>-</td>
<td>0.99</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Silo - EU-103, Weigh Hopper EU-156, Weigh Hopper EU-157</td>
<td>5.21</td>
<td>5.21</td>
<td>5.21</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Silo - EU-105</td>
<td>5.21</td>
<td>5.21</td>
<td>5.21</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Cibec Mixer - EU123C</td>
<td>4.17</td>
<td>2.09</td>
<td>2.09</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Cibec Mixer - EU125</td>
<td>4.17</td>
<td>2.09</td>
<td>2.09</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Weigh Hopper - EU158</td>
<td>18.93</td>
<td>6.79</td>
<td>6.79</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Weigh Hopper - EU-159</td>
<td>18.93</td>
<td>6.79</td>
<td>6.79</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Rotary Kilns - Process Emissions - EU-101</td>
<td>49.71</td>
<td>9.02</td>
<td>9.02</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.71</td>
</tr>
<tr>
<td>Rotary Kilns - Process Emissions - EU-102</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Rotary Kilns - Natural Gas Combustion - EU-101 and EU-102</td>
<td>0.16</td>
<td>0.65</td>
<td>0.65</td>
<td>5.15E-02</td>
<td>8.59</td>
<td>0.47</td>
<td>7.21</td>
<td>0.16</td>
</tr>
<tr>
<td>Moritz Mills - EU-152</td>
<td>16.12</td>
<td>16.12</td>
<td>16.12</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Moritz Mills - EU-153</td>
<td>16.12</td>
<td>16.12</td>
<td>16.12</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Moritz Mill - EU-154</td>
<td>16.12</td>
<td>16.12</td>
<td>16.12</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td>6.98E-02</td>
<td>0.28</td>
<td>0.28</td>
<td>2.21E-02</td>
<td>3.68</td>
<td>0.20</td>
<td>3.09</td>
<td>6.94E-02</td>
</tr>
<tr>
<td>Plastic extrusion lines</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.26</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>160.96</td>
<td>92.71</td>
<td>92.71</td>
<td>7.36E-02</td>
<td>12.26</td>
<td>7.24</td>
<td>10.30</td>
<td>1.76</td>
</tr>
</tbody>
</table>

**Notes:**
1. The shaded cells indicate where limits are included.
2. PM2.5 listed is direct PM2.5
Appendix A: Emission Calculations
Particulate Emissions from Silos (EU-106 through EU-108)

Company Name: Ilpea Industries, Inc.
Source Location: 1320 S Main Street, Scottsburg, Indiana 47170
Operating Permit Number: F143-32451-00018
Significant Permit Revision Number: 143-41469-00018
Reviewer: Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Process</th>
<th>Maximum Throughput (tons/year)</th>
<th>PM/PM10/PM2.5 Emission Factor (lb/ton)</th>
<th>PTE PM/PM10/PM2.5 (lb/hr)</th>
<th>PTE PM/PM10/PM2.5 (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-106</td>
<td>Polyvinyl Chloride</td>
<td>5480.00</td>
<td>0.10</td>
<td>0.06</td>
<td>0.27</td>
</tr>
<tr>
<td>EU-107</td>
<td>Polyvinyl Chloride</td>
<td>5480.00</td>
<td>0.10</td>
<td>0.06</td>
<td>0.27</td>
</tr>
<tr>
<td>EU-108</td>
<td>Calcium Carbonate</td>
<td>7950.00</td>
<td>0.10</td>
<td>0.09</td>
<td>0.40</td>
</tr>
</tbody>
</table>

*Emission factors are from Fire 6.25, for SCC 3-05-007-07, cement manufacturing, unloading raw materials.
*Assume PM10 = PM2.5
Note: the maximum capacity of EU-106 and EU-107 has been revised from 7950 tons per year to 5480 tons per year.

**Methodology**
PTE PM/PM10 (tons/yr) = Maximum Throughput (tons/yr) x Emission factor (lb/ton) x 1 ton/2000 lbs
## Appendix A: Emission Calculations

### VOC and Particulate Emissions from one (1) Banbury Mixer (EU-122) and Twin Banbury/Extruder/Mixer Line (EU-123B)

**Company Name:** Ilpea Industries, Inc.  
**Source Location:** 1320 S Main Street, Scottsburg, Indiana 47170  
**Operating Permit Number:** F143-32451-00018  
**Significant Permit Revision Number:** 143-41469-00018  
**Reviewer:** Alexandrea Neuzerling

### Emission Calculations

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Control Device</th>
<th>Process</th>
<th>Process Weight (lb/hr)</th>
<th>Process Weight (tons/yr)</th>
<th>PM Emission Factor (lb/ton)</th>
<th>PTE PM Emis. (tons/year)</th>
<th>PM10 Emission Factor (lb/ton)</th>
<th>PTE PM10 Emis. (tons/year)</th>
<th>Control Efficiency (%)</th>
<th>Controlled PTE PM/PM (tons/year)</th>
<th>Controlled PTE PM10/PM10 (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-122</td>
<td>C-122</td>
<td>Banbury Mixer (EU-122)</td>
<td>3,700</td>
<td>16,206</td>
<td>26.0</td>
<td>210.68</td>
<td>26.0</td>
<td>210.68</td>
<td>99.00%</td>
<td>2.11</td>
<td>0.48</td>
</tr>
<tr>
<td>EU-123B</td>
<td></td>
<td>Twin Banbury/Extruder/Mixer Line (EU-123B)</td>
<td>4,400</td>
<td>19,272</td>
<td>26.0</td>
<td>250.54</td>
<td>26.0</td>
<td>250.54</td>
<td>99.00%</td>
<td>2.51</td>
<td>0.57</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>99.00%</strong></td>
<td><strong>4.61</strong></td>
<td><strong>1.05</strong></td>
</tr>
</tbody>
</table>

**Notes:**  
- The PM/PM10 emission factors are based on baghouse collection information.  
- The baghouse C-122 is a common control device used for twin banbury/extruder/mixer line EU-123B and Banbury Mixer EU-122. Stack testing will be required in this FESOP to verify the emission factors.  
- *Assume PM10 = PM2.5*

**Methodology:**  

\[ \text{Potential to emit PM/PM10 (tons/year)} = \text{Emission Factor (lb/hr) x 8,760 hr/year x 1 ton/2000 lbs} \]

### 326 IAC 6-3-2 PM Allowable Rate of Emissions

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Maximum capacity of Banbury Mixers (lbs/hr)</th>
<th>Process Weight Rate (tons/hr)</th>
<th>Allowable PM Emissions (lbs/hr)</th>
<th>Allowable PM Emissions (tons/yr)</th>
<th>Unlimited PM emissions (lb/hr)</th>
<th>Unlimited PM emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-122</td>
<td>3,700</td>
<td>1.85</td>
<td>6.19</td>
<td>27.12</td>
<td>48.1</td>
<td></td>
</tr>
<tr>
<td>EU-123B</td>
<td>4,400</td>
<td>2.20</td>
<td>6.95</td>
<td>30.46</td>
<td>57.2</td>
<td></td>
</tr>
</tbody>
</table>

**Notes for the Banbury Mixers:** PM emissions allowable under 6-3-2 and PM10/PM2.5 emissions are limited under FESOP.
# Appendix A: Emission Calculations

VOC and Particulate Emissions from Pellet Production (EU-112 through EU-113, EU-115 through EU-118)

**Company Name:** Ilpea Industries, Inc.  
**Source Location:** 1320 S Main Street, Scottsburg, Indiana 47170  
**Operating Permit Number:** F143-32451-00018  
**Significant Permit Revision Number:** 143-41469-00018  
**Reviewer:** Alexandrea Neuzerling

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Material Processed</th>
<th>Process Weight (lb/hr)</th>
<th>Process Weight (tons/yr)</th>
<th>PM Emission Factor (lb/ton)</th>
<th>PTE PM (tons/year)</th>
<th>PM10 Emission Factor (lb/ton)</th>
<th>PTE PM10/PM2.5 (tons/year)</th>
<th>VOC Emission Factor (lb/ton)</th>
<th>PTE VOC (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-112</td>
<td>Plastic Pellets</td>
<td>3,500</td>
<td>15,330</td>
<td>0.032</td>
<td>0.25</td>
<td>0.032</td>
<td>0.25</td>
<td>0.30</td>
<td>0.25</td>
</tr>
<tr>
<td>EU-113</td>
<td>Plastic Pellets</td>
<td>700</td>
<td>3,066</td>
<td>0.032</td>
<td>0.05</td>
<td>0.032</td>
<td>0.05</td>
<td>0.30</td>
<td>0.05</td>
</tr>
<tr>
<td>EU-115</td>
<td>Plastic Pellets</td>
<td>1,200</td>
<td>5,256</td>
<td>0.032</td>
<td>0.08</td>
<td>0.032</td>
<td>0.08</td>
<td>0.30</td>
<td>0.08</td>
</tr>
<tr>
<td>EU-116</td>
<td>Plastic Pellets</td>
<td>1,200</td>
<td>5,256</td>
<td>0.032</td>
<td>0.08</td>
<td>0.032</td>
<td>0.08</td>
<td>0.30</td>
<td>0.08</td>
</tr>
<tr>
<td>EU-117</td>
<td>Plastic Pellets</td>
<td>1,500</td>
<td>6,570</td>
<td>0.032</td>
<td>0.11</td>
<td>0.032</td>
<td>0.11</td>
<td>0.30</td>
<td>0.11</td>
</tr>
<tr>
<td>EU-118</td>
<td>Plastic Pellets</td>
<td>1,500</td>
<td>6,570</td>
<td>0.032</td>
<td>0.11</td>
<td>0.032</td>
<td>0.11</td>
<td>0.30</td>
<td>0.11</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>6.31</strong></td>
<td></td>
<td><strong>0.67</strong></td>
<td></td>
<td><strong>0.67</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Notes: The PM, PM10, and VOC emission factors are based on emission factors for a similar facility (Chemtrusion, FESOP 019-9688-00091), the EF based on the SCC: 3-01-018-21.  
*Assume PM10 = PM2.5

**Methodology:**  
Potential to emit PM, PM10, and VOC (tons/year) = Maximum Process Weight (tons/yr) x Emission Factor (lb/ton) x 1 ton/2000 lbs

The plastic pellet production lines are not subject to 326 IAC 6-3-2 because the potential to emit PM from each unit is less than 0.551 pounds per hour, exempt.
### Appendix A: Emission Calculations

**Particulate Emissions from EU-103, EU-105, EU-156, and EU-157**

**Company Name:** Ilpea Industries, Inc.  
**Source Location:** 1320 S Main Street, Scottsburg, Indiana 47170  
**Operating Permit Number:** F143-32451-00018  
**Significant Permit Revision Number:** 143-41469-00018  
**Reviewer:** Alexandrea Neuzerling

#### 1. Truck Unloading

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Process</th>
<th>Maximum Throughput&lt;sup&gt;1&lt;/sup&gt; (tons/hr)</th>
<th>Emission Factor&lt;sup&gt;2&lt;/sup&gt;</th>
<th>Uncontrolled PTE (tons/yr)</th>
<th>Bottlenecked PTE (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>(tons/yr)</td>
<td></td>
<td>(tons/hr)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM PM10/PM2.5 PM PM10/PM2.5 PM PM10/PM2.5</td>
<td></td>
<td>PM PM10/PM2.5 PM PM10/PM2.5</td>
<td></td>
</tr>
<tr>
<td>EU-103</td>
<td>truck unloading</td>
<td>12.50</td>
<td>3.14</td>
<td>1.10</td>
<td>39.25</td>
</tr>
<tr>
<td>EU-105</td>
<td>truck unloading</td>
<td>12.50</td>
<td>3.14</td>
<td>1.10</td>
<td>39.25</td>
</tr>
</tbody>
</table>

#### 1. Truck Unloading

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Process</th>
<th>Maximum Throughput&lt;sup&gt;1&lt;/sup&gt; (tons/hr)</th>
<th>Emission Factor&lt;sup&gt;2&lt;/sup&gt;</th>
<th>Bottlenecked PTE (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>(tons/yr)</td>
<td></td>
<td>(tons/hr)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM PM10/PM2.5 PM PM10/PM2.5 PM PM10/PM2.5</td>
<td></td>
<td>PM PM10/PM2.5 PM PM10/PM2.5</td>
</tr>
<tr>
<td>EU-103</td>
<td>truck unloading</td>
<td>12.50</td>
<td>0.0089</td>
<td>0.0049</td>
</tr>
<tr>
<td>EU-105</td>
<td>truck unloading</td>
<td>12.50</td>
<td>0.0089</td>
<td>0.0049</td>
</tr>
</tbody>
</table>

#### 1. Truck Unloading

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Process</th>
<th>Bottlenecked Throughput&lt;sup&gt;3&lt;/sup&gt; (tons/day)</th>
<th>Emission Factor&lt;sup&gt;2&lt;/sup&gt;</th>
<th>Bottlenecked PTE (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>(tons/day)</td>
<td></td>
<td>(tons/hr)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM PM10/PM2.5 PM PM10/PM2.5 PM PM10/PM2.5</td>
<td></td>
<td>PM PM10/PM2.5 PM PM10/PM2.5</td>
</tr>
<tr>
<td>EU-103</td>
<td>truck unloading</td>
<td>24.9</td>
<td>3.14</td>
<td>1.10</td>
</tr>
<tr>
<td>EU-105</td>
<td>truck unloading</td>
<td>24.9</td>
<td>0.0089</td>
<td>0.0049</td>
</tr>
</tbody>
</table>

#### 1. Truck Unloading

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Process</th>
<th>Bottlenecked Throughput&lt;sup&gt;3&lt;/sup&gt; (tons/day)</th>
<th>Emission Factor&lt;sup&gt;2&lt;/sup&gt;</th>
<th>Bottlenecked PTE (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>(tons/day)</td>
<td></td>
<td>(tons/hr)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM PM10/PM2.5 PM PM10/PM2.5 PM PM10/PM2.5</td>
<td></td>
<td>PM PM10/PM2.5 PM PM10/PM2.5</td>
</tr>
<tr>
<td>EU-103</td>
<td>truck unloading</td>
<td>48.0</td>
<td>3.14</td>
<td>1.10</td>
</tr>
<tr>
<td>EU-105</td>
<td>truck unloading</td>
<td>48.0</td>
<td>0.0089</td>
<td>0.0049</td>
</tr>
</tbody>
</table>

#### Notes:
1. Truck unloading throughput is 417 lb/min
3. As of October 30, 2018, only a single Cibec mixer (EU-123C) is installed.

#### Methodology
- Uncontrolled PTE (lb/hr) = Maximum Throughput (tons/hr) x Emission Factor (lb/ton)
- Uncontrolled PTE (tons/yr) = Uncontrolled PTE (lb/hr) x 8,760 (hr/yr) / 2,000 (lb/ton)
- Bottlenecked PTE (tons/yr) = Bottlenecked Throughput (tons/day) x Emission Factor (lb/ton) x 365 (days/yr) / 2,000 (lb/ton)
Appendix A: Emission Calculations
Particulate Emissions from EU-103, EU-105, EU-156, and EU-157

Company Name: Ilpea Industries, Inc.
Source Location: 1320 S Main Street, Scottsburg, Indiana 47170
Operating Permit Number: F143-32451-00018
Significant Permit Revision Number: 143-41469-00018
Reviewer: Alexandrea Neuzerling

2. Weigh Hoppers

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Process</th>
<th>Maximum Throughput (tons/hr)</th>
<th>Emission Factor (lb/hr)</th>
<th>Uncontrolled PTE tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-156</td>
<td>weigh hopper loading</td>
<td>4.00</td>
<td>0.0048</td>
<td>0.0028</td>
</tr>
<tr>
<td>EU-157</td>
<td>weigh hopper loading</td>
<td>4.00</td>
<td>0.0048</td>
<td>0.0028</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Process</th>
<th>Bottlenecked Throughput (tons/day)</th>
<th>Emission Factor (lb/ton)</th>
<th>Bottlenecked PTE tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-156</td>
<td>weigh hopper loading</td>
<td>24.00</td>
<td>0.0048</td>
<td>0.0028</td>
</tr>
<tr>
<td>EU-157</td>
<td>weigh hopper loading</td>
<td>24.00</td>
<td>0.0048</td>
<td>0.0028</td>
</tr>
</tbody>
</table>

Notes:
1. Mixing is a batch process with a capacity of six (6) batches per day per mixer. As of October 30, 2018, only a single Cibec mixer (EU-123C) is installed. As a worst case, Uncontrolled PTE (lb/hr) is calculated on a basis of weighing out one batch in one hour.

Methodology
Uncontrolled PTE (lb/hr) = Maximum Throughput (tons/hr) x Emission Factor (lb/ton)
Uncontrolled PTE (tons/yr) = Uncontrolled PTE (lb/hr) x 8,760 (hr/yr) / 2,000 (lb/ton)
Bottlenecked PTE (tons/yr) = Bottlenecked Throughput (tons/day) x Emission Factor (lb/ton) x 365 (days/yr) / 2,000 (lb/ton)

3. Potential to Emit After Issuance

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Process</th>
<th>Control Device ID</th>
<th>Potential to Emit After Issuance tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-105</td>
<td>iron oxide unloading to silo 2</td>
<td>C-107</td>
<td>5.21</td>
</tr>
<tr>
<td>EU-103</td>
<td>iron oxide unloading to silo 1</td>
<td>C-156</td>
<td>5.21</td>
</tr>
<tr>
<td>EU-156</td>
<td>iron oxide transfer to weigh hopper</td>
<td>C-156</td>
<td>5.21</td>
</tr>
<tr>
<td>EU-157</td>
<td>iron oxide transfer to weigh hopper</td>
<td>C-156</td>
<td>5.21</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td>10.42</td>
</tr>
</tbody>
</table>
### Particulate Emissions from Mixers (EU-123C and EU-125)

**Company Name:** Ilpea Industries, Inc.  
**Source Location:** 1320 S Main Street, Scottsburg, Indiana 47170  
**Operating Permit Number:** F143-32451-00018  
**Significant Permit Revision Number:** 143-41469-00018  
**Reviewer:** Alexandrea Neuzerling

#### Methodology

- **Maximum throughput (tons/day)** = **maximum throughput (lbs/batch)** * 8 (batch/day) / 2000 (lbs/ton)
- **PTE PM/PM10/PM2.5 (lbs/day)** = **Maximum throughput (tons/day)** * **EMission factor (lb/ton)**
- **PTE PM/PM10/PM2.5 (tons/yr)** = **Maximum throughput (tons/day)** * **EMission factor (lb/ton)** * 1 ton/2000 lbs x 365 days/yr

#### Emission Factors

- **PM Emission Factor (lb/ton)**: 0.60
- **PM10/PM2.5 Emission Factor (lb/ton)**: 0.30

#### Table: Emission Calculations

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Process</th>
<th>Maximum Throughput (lbs/batch)</th>
<th>Maximum Throughput (tons/day)</th>
<th>PM Emission Factor (lb/ton)*</th>
<th>PM10/PM2.5 Emission Factor (lb/ton)*</th>
<th>PTE PM (lb/day)</th>
<th>PTE PM (lb/hr)</th>
<th>PTE PM10/PM2.5 (lbs/day)</th>
<th>PTE PM (tons/yr)</th>
<th>PTE PM10/PM2.5 (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-123C</td>
<td>Cibec Mixer</td>
<td>9,530</td>
<td>38.12</td>
<td>0.60</td>
<td>0.30</td>
<td>22.87</td>
<td>0.95</td>
<td>11.44</td>
<td>4.17</td>
<td>4.29</td>
</tr>
<tr>
<td>EU-125</td>
<td>Cibec Mixer</td>
<td>9,530</td>
<td>38.12</td>
<td>0.60</td>
<td>0.30</td>
<td>22.87</td>
<td>0.95</td>
<td>11.44</td>
<td>4.17</td>
<td>4.17</td>
</tr>
</tbody>
</table>

*Emission factors are from Fire 6.25, for SCC 3-05-012-23, fiberglass manufacturing, mixing and weighting.

**Assume PM10 = PM2.5**

#### Allowable PM Emissions under 326 IAC 6-3-2

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Process</th>
<th>Maximum Throughput (tons/hr)*</th>
<th>Allowable PM Emissions (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-123C</td>
<td>Cibec Mixer</td>
<td>1.69</td>
<td>5.59</td>
</tr>
<tr>
<td>EU-125</td>
<td>Cibec Mixer</td>
<td>1.59</td>
<td>5.59</td>
</tr>
</tbody>
</table>

**Methodology**

- Process Weight Rate (tons/hr) = Maximum Throughput (tons/day) / 24hrs/day
- Interpolation of the data in this table for process weight rates up to sixty thousand (60,000) pounds per hour: E = 4.10 * P^0.67
- Allowable PM Limit = 4.10 * P^0.67
## Appendix A: Emission Calculations

### Particulate Emissions from Hoppers (EU-158, EU-159)

**Company Name:** Ilpea Industries, Inc.  
**Source Location:** 1320 S Main Street, Scottsburg, Indiana 47170  
**Operating Permit Number:** F143-32451-00018  
**Significant Permit Revision Number:** 143-41469-00018  
**Reviewer:** Alexandrea Neuzerling

### Control Efficiency

<table>
<thead>
<tr>
<th>Control Device</th>
<th>Units</th>
<th>Control Efficiency (%)</th>
<th>Controlled Emissions (lb/hr)</th>
<th>Controlled Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-158 C-158</td>
<td>26.0</td>
<td>97.02%</td>
<td>0.77</td>
<td>3.39</td>
</tr>
<tr>
<td>EU-159 C-159</td>
<td>26.0</td>
<td>97.02%</td>
<td>0.77</td>
<td>3.39</td>
</tr>
</tbody>
</table>

**Notes:**  
**The PM are based on baghouse information of laden inlet gas of the control device provided by source, as indicated in the F143-32451-00018, on August 5, 2013. Assume PM = PM10 = PM2.5**

### Methodology

Uncontrolled PM/PM10 Emissions (ton/yr) = Particulate inlet (lb/hr) * 8760 hr/yr * 1 ton/2000 lbs  
Controlled PM/PM10 Emissions (lb/hr) = Uncontrolled Emissions (lb/hr) * (1 - Control Efficiency %)  
Controlled PM/PM10 Emissions (ton/yr) = Controlled Emissions (lbs/hr) * 8760 hrs/yr * 1 ton/2000 lbs

### 326 IAC 6-3-2(e) Allowable Rate of Emissions

<table>
<thead>
<tr>
<th>Unit ID#</th>
<th>Maximum capacity of Weigh Hopper (lbs/hr)</th>
<th>Process Weight Rate (tons/hr)</th>
<th>Allowable PM Emissions (lbs/hr)</th>
<th>Allowable PM Emissions (tons/yr)</th>
<th>PSD Minor Limit (PM)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-158</td>
<td>870.00</td>
<td>0.44</td>
<td>2.35</td>
<td>10.28</td>
<td>18.83</td>
</tr>
<tr>
<td>EU-159</td>
<td>870</td>
<td>0.44</td>
<td>2.35</td>
<td>10.28</td>
<td>18.83</td>
</tr>
</tbody>
</table>

**Notes for the Weigh Hoppers:** PM emissions allowable under 6-3-2 and PM10/PM2.5 emissions are limited under FESOP.
Appendix A: Emission Calculations
Particulate/HCl/Cl Emissions
Two (2) Rotary Kilns (EU-101 and EU-102) with Wet Scrubber

Company Name: Ilpea Industries, Inc.
Source Location: 1320 S Main Street, Scottsburg, Indiana 47170
Operating Permit Number: F143-32451-00018
Significant Permit Revision Number: 143-41469-00018
Reviewer: Alexandrea Neuzerling

1. Uncontrolled Potential to Emit

Kiln #1 (EU-101)

<table>
<thead>
<tr>
<th>Maximum Capacity</th>
<th>Annual Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td>lb/hr</td>
<td>ton/yr</td>
</tr>
<tr>
<td>3,000</td>
<td>13,140</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Factor in lb/ton</th>
<th>PM</th>
<th>PM10</th>
<th>HCl (stack test, lb/hr)</th>
<th>Cl (stack test, lb/hr)</th>
<th>Controlled PM</th>
<th>Controlled PM10</th>
<th>Controlled HCl</th>
<th>Controlled Cl</th>
</tr>
</thead>
<tbody>
<tr>
<td>130.0</td>
<td>31.0</td>
<td>0.13</td>
<td>0.01</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Potential Emission in tons/yr

<table>
<thead>
<tr>
<th>Kiln #2 (EU-102)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maximum Capacity</td>
</tr>
<tr>
<td>------------------</td>
</tr>
<tr>
<td>lb/hr</td>
</tr>
<tr>
<td>3,500</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Factor in lb/ton</th>
<th>PM</th>
<th>PM10</th>
<th>HCl (stack test, lb/hr)</th>
<th>Cl (stack test, lb/hr)</th>
<th>Controlled PM</th>
<th>Controlled PM10</th>
<th>Controlled HCl</th>
<th>Controlled Cl</th>
</tr>
</thead>
<tbody>
<tr>
<td>130.0</td>
<td>31.0</td>
<td>0.15</td>
<td>0.01</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Potential Emission in tons/yr

*Emission factors for PM and PM10 are from AP-42, Chapter 11.6, Table 11.6.2. HCl and Cl emission factors are based from stack test data from the equipment in use at its previous facility.
* Assume PM10 = PM2.5

Methodology
Potential to Emit PM/PM10(tons/yr) = Annual Throughput (ton/yr) x Emission Factor (lb/ton) x 1 ton /2,000 lb
Potential to Emit HCl (tons/yr) = Collected by Scrubber (tons/yr) / Control Efficiency (%)
2. 326 IAC 6-3-2(e) Allowable Rate of Emissions

<table>
<thead>
<tr>
<th>Unit ID#</th>
<th>Maximum capacity of Rotary Kiln (lbs/hr)</th>
<th>Process Weight Rate (tons/hr)</th>
<th>Allowable PM Emissions (lbs/hr)</th>
<th>Allowable PM Emissions (tons/hr)</th>
<th>Unlimited PM Emissions (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-101</td>
<td>3,000</td>
<td>1.50</td>
<td>5.38</td>
<td>23.56</td>
<td>195</td>
</tr>
<tr>
<td>EU-102</td>
<td>3,500</td>
<td>1.75</td>
<td>5.97</td>
<td>26.13</td>
<td>227.5</td>
</tr>
</tbody>
</table>

Notes for the Rotary Kilns: PM emissions allowable under 6-3-2 and PM10/PM2.5 emissions are limited under FESOP.

3. Potential to Emit After Issuance

<table>
<thead>
<tr>
<th>Unit</th>
<th>Potential to Emit After Issuance</th>
<th>PM</th>
<th>PM10/PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(lb/hr)</td>
<td>(tons/hr)</td>
<td>(lb/hr)</td>
</tr>
<tr>
<td>Powder metal calcining (EU-101 or EU-102)</td>
<td>11.35</td>
<td>49.71</td>
<td>2.06</td>
</tr>
</tbody>
</table>

Methodology

\[\text{PTE (tons/yr)} = \frac{\text{PTE (lb/hr) \times 8,760 (hr/yr)}}{2,000 \text{ (lb/ton)}}\]
### Appendix A: Emission Calculations

#### Particulate/HCl/Cl Emissions

**Two (2) Rotary Kilns (EU-101 and EU-102) with Dry Scrubber**

**Company Name:** Ilpea Industries, Inc.  
**Source Location:** 1320 S Main Street, Scottsburg, Indiana 47170  
**Operating Permit Number:** F143-32451-00018  
**Significant Permit Revision Number:** 143-41469-00018  
**Reviewer:** Alexandrea Neuzerling

---

#### 1. Uncontrolled Potential to Emit

**Kiln #1 (EU-101)**

<table>
<thead>
<tr>
<th>Maximum Capacity (lb/hr)</th>
<th>Annual Throughput (ton/yr)</th>
<th>Particulate Control Efficiency</th>
<th>HCl Control Efficiency</th>
<th>Cl Control Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>3,000</td>
<td>13,140</td>
<td>99.0%</td>
<td>80.0%</td>
<td>95.00%</td>
</tr>
</tbody>
</table>

**Emission Factor in lb/ton**

<table>
<thead>
<tr>
<th>Emission Factor in lb/ton</th>
<th>PM</th>
<th>PM10</th>
<th>HCl (stack test, lb/hr)</th>
<th>Cl (stack test, lb/hr)</th>
<th>Controlled PM</th>
<th>Controlled PM10</th>
<th>Controlled HCl</th>
<th>Controlled Cl</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>130.0</td>
<td>31.0</td>
<td>0.13</td>
<td>0.01</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Potential Emission in tons/yr**

<table>
<thead>
<tr>
<th>Kiln #1 (EU-101)</th>
<th>PM</th>
<th>PM10</th>
<th>HCl</th>
<th>Cl</th>
<th>PM</th>
<th>PM10</th>
<th>HCl</th>
<th>Cl</th>
</tr>
</thead>
<tbody>
<tr>
<td>854</td>
<td>204</td>
<td>0.71</td>
<td>0.05</td>
<td>8.54</td>
<td>2.04</td>
<td>0.14</td>
<td>0.01</td>
<td></td>
</tr>
</tbody>
</table>

---

**Kiln #2 (EU-102)**

<table>
<thead>
<tr>
<th>Maximum Capacity (lb/hr)</th>
<th>Annual Throughput (ton/yr)</th>
<th>Particulate Control Efficiency</th>
<th>HCl Control Efficiency</th>
<th>Cl Control Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>3,500</td>
<td>15,330</td>
<td>99.0%</td>
<td>80.0%</td>
<td>95.00%</td>
</tr>
</tbody>
</table>

**Emission Factor in lb/ton**

<table>
<thead>
<tr>
<th>Emission Factor in lb/ton</th>
<th>PM</th>
<th>PM10</th>
<th>HCl (stack test, lb/hr)</th>
<th>Cl (stack test, lb/hr)</th>
<th>Controlled PM</th>
<th>Controlled PM10</th>
<th>Controlled HCl</th>
<th>Controlled Cl</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>130.0</td>
<td>31.0</td>
<td>0.15</td>
<td>0.01</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Potential Emission in tons/yr**

<table>
<thead>
<tr>
<th>Kiln #2 (EU-102)</th>
<th>PM</th>
<th>PM10</th>
<th>HCl</th>
<th>Cl</th>
<th>PM</th>
<th>PM10</th>
<th>HCl</th>
<th>Cl</th>
</tr>
</thead>
<tbody>
<tr>
<td>996.45</td>
<td>237.62</td>
<td>0.82</td>
<td>0.05</td>
<td>9.96</td>
<td>2.38</td>
<td>0.16</td>
<td>0.003</td>
<td></td>
</tr>
</tbody>
</table>

---

*Emission factors for PM and PM10 are from AP-42, Chapter 11.6, Table 11.6.2. HCL and Cl emission factors are based from stack test data from the equipment in use at its previous facility.*

**Methodology**

- Potential to Emit PM/PM10 (tons/yr) = Annual Throughput (ton/yr) x Emission Factor (lb/ton) x 1 ton /2,000 lb
- Potential to Emit HCl (tons/yr) = Collected by Scrubber (tons/yr) / Control Efficiency (%)
## Appendix A: Emission Calculations

### Particulate/HCl/Cl Emissions

#### Two (2) Rotary Kilns (EU-101 and EU-102) with Dry Scrubber

**Company Name:** Ilpea Industries, Inc.  
**Source Location:** 1320 S Main Street, Scottsburg, Indiana 47170  
**Operating Permit Number:** F143-32451-00018  
**Significant Permit Revision Number:** 143-41469-00018  
**Reviewer:** Alexandrea Neuzerling

#### 2. 326 IAC 6-3-2(e) Allowable Rate of Emissions

<table>
<thead>
<tr>
<th>Unit ID#</th>
<th>Maximum capacity of Rotary Kiln (lbs/hr)</th>
<th>Process Weight Rate (tons/hr)</th>
<th>Allowable PM Emissions (lbs/hr)</th>
<th>Allowable PM Emissions (tons/hr)</th>
<th>Unlimited PM emissions (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-101</td>
<td>3,000</td>
<td>1.50</td>
<td>5.38</td>
<td>23.56</td>
<td>195</td>
</tr>
<tr>
<td>EU-102</td>
<td>3,500</td>
<td>1.75</td>
<td>5.97</td>
<td>26.13</td>
<td>227.5</td>
</tr>
</tbody>
</table>

Notes for the Rotary Kilns: PM emissions allowable under 6-3-2 and PM10/PM2.5 emissions are limited under FESOP.

#### 3. Potential to Emit After Issuance

<table>
<thead>
<tr>
<th>Unit</th>
<th>Potential to Emit After Issuance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>PM (lb/hr)</td>
</tr>
<tr>
<td></td>
<td>(tons/hr)</td>
</tr>
<tr>
<td>Powder metal calcining (EU-101 or EU-102)</td>
<td>11.35</td>
</tr>
<tr>
<td></td>
<td>49.71</td>
</tr>
<tr>
<td></td>
<td>2.06</td>
</tr>
<tr>
<td></td>
<td>9.02</td>
</tr>
</tbody>
</table>

**Methodology**

PTE (tons/yr) = PTE (lb/hr) x 8,760 (hr/yr) / 2,000 (lb/ton)
### Appendix A: Emission Calculations

#### Natural Gas Combustion Only

**Company Name:** Ilpea Industries, Inc.  
**Source Location:** 1320 S Main Street, Scottsburg, Indiana 47170  
**Operating Permit Number:** F143-32451-00018  
**Significant Permit Revision Number:** 143-41469-00018  
**Reviewer:** Alexandrea Neuzerling

From two (2) rotary calcinating kilns (EU-101 and EU-102)

<table>
<thead>
<tr>
<th>Heat Input Capacity</th>
<th>HHV MMBtu/hr</th>
<th>Potential Throughput mmscf/MMBtu</th>
<th>MMBtu/MMCF</th>
</tr>
</thead>
<tbody>
<tr>
<td>20.0</td>
<td>1020</td>
<td>171.8</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>1.9</td>
<td>0.16</td>
</tr>
<tr>
<td>PM10*</td>
<td>7.6</td>
<td>0.65</td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>7.6</td>
<td>0.65</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.05</td>
</tr>
<tr>
<td>NOx</td>
<td>100</td>
<td>8.59</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>0.47</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>7.21</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is filterable and condensable PM2.5 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

*Assume PM10 = PM2.5

**Methodology**

All emission factors are based on normal firing.

- MMBtu = 1,000,000 Btu
- MMCF = 1,000,000 Cubic Feet of Gas

Potentials 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

#### HAPs - Organics

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMCf</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
</tr>
</thead>
<tbody>
<tr>
<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>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>1.8E-04</td>
<td>1.0E-04</td>
<td>6.4E-03</td>
<td>0.15</td>
<td>2.9E-04</td>
</tr>
</tbody>
</table>

#### HAPs - Metals

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMCf</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
</tr>
</thead>
<tbody>
<tr>
<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>4.3E-05</td>
<td>9.4E-05</td>
<td>1.2E-04</td>
<td>3.3E-05</td>
<td>1.8E-04</td>
</tr>
</tbody>
</table>

| **Total**                  | 0.16  |

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

Process Emissions

Three (3) Moritz Mills (EU-152, EU-153, and EU-154)

Company Name: Ilpea Industries, Inc.
Source Location: 1320 S Main Street, Scottsburg, Indiana 47170
Operating Permit Number: F143-32451-00018
Significant Permit Revision Number: 143-41469-00018
Reviewer: Alexandrea Neuzerling

Moritz Mills (EU-152 & EU-153)

<table>
<thead>
<tr>
<th>Maximum Capacity (lb/hr)</th>
<th>Annual Throughput (ton/yr)</th>
<th>Control Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>1,700</td>
<td>7.446</td>
<td>99.0%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Uncontrolled Potential to Emit (tons/yr)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>PM2.5</td>
</tr>
<tr>
<td>25.0</td>
<td>25.0</td>
</tr>
<tr>
<td>EU-152</td>
<td>110</td>
</tr>
<tr>
<td>Total</td>
<td>219</td>
</tr>
</tbody>
</table>

Moritz Mills (EU-154)

<table>
<thead>
<tr>
<th>Maximum Capacity (lb/hr)</th>
<th>Annual Throughput (ton/yr)</th>
<th>Control Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>1,700</td>
<td>7.446</td>
<td>99.0%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Uncontrolled Potential to Emit (tons/yr)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>PM10</td>
</tr>
<tr>
<td>25.0</td>
<td>25.0</td>
</tr>
<tr>
<td>EU-154</td>
<td>110</td>
</tr>
<tr>
<td>Total</td>
<td>219</td>
</tr>
</tbody>
</table>

*Emission factors are based on baghouse collections and their efficiencies and the production run on each mill.

*Assume PM10 = PM2.5

Methodology

Potential to Emit PM and PM10 (tons/yr) = Emission Factor (lb/hr) x (8760 hr/year) x 1 ton/2,000 lb
Controlled PM/PM10 (tons/yr) = PTE PM/PM10 x (1 - Control Efficiency %)

326 IAC 6-3-2(e) Allowable Rate of Emissions

<table>
<thead>
<tr>
<th>Unit ID#</th>
<th>Maximum capacity of Moritz Mills (lbs/hr)</th>
<th>Process Weight Rate (tons/hr)</th>
<th>Allowable PM Emissions (lb/hr)</th>
<th>Allowable PM Emissions (tons/yr)</th>
<th>Unlimited PM emissions (lb/hr)</th>
<th>Unlimited PM emissions (tons/yr)</th>
<th>FESOP and PSD Minor Limits</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-152</td>
<td>1,700</td>
<td>0.85</td>
<td>3.68</td>
<td>16.11</td>
<td>25</td>
<td>3.68</td>
<td>16.12</td>
</tr>
<tr>
<td>EU-153</td>
<td>1,700</td>
<td>0.85</td>
<td>3.68</td>
<td>16.11</td>
<td>25</td>
<td>3.68</td>
<td>16.12</td>
</tr>
<tr>
<td>EU-154</td>
<td>1,700</td>
<td>0.85</td>
<td>3.68</td>
<td>16.11</td>
<td>25</td>
<td>3.68</td>
<td>48.36</td>
</tr>
</tbody>
</table>

Notes for the Moritz Mills: PM emissions allowable under 6-3-2 and PM10/PM2.5 emissions are limited under FESOP.
### Appendix A: Emission Calculations

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Company Name:** Ilpea Industries, Inc.

**Source Location:** 1320 S Main Street, Scottsburg, Indiana 47170

**Operating Permit Number:** F143-32451-00018

**Significant Permit Revision Number:** 143-41469-00018

**Reviewer:** Alexandrea Neuzerling

---

#### Natural Gas Combustion Only

**MM BTU/HR <100**

<table>
<thead>
<tr>
<th>Description</th>
<th>Unit ID Number</th>
<th>Unit Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>air makeup unit</td>
<td>EU-119</td>
<td>1.10</td>
</tr>
<tr>
<td>space heaters</td>
<td>EU-136, EU-141 - EU-143</td>
<td>0.14</td>
</tr>
<tr>
<td>space heaters</td>
<td>EU-137 - EU-140, EU-144 - EU-147</td>
<td>0.25</td>
</tr>
<tr>
<td>space heaters</td>
<td>EU-148, EU-149</td>
<td>0.40</td>
</tr>
<tr>
<td>boiler</td>
<td>EU-151</td>
<td>2.50</td>
</tr>
<tr>
<td>space heaters</td>
<td>EU-170 - EU-173</td>
<td>0.40</td>
</tr>
</tbody>
</table>

**Total** 8.56

---

### Heat Input Capacity

<table>
<thead>
<tr>
<th>Description</th>
<th>Heat Input Capacity</th>
<th>Potential Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>MM BTU/hr/MMCF</td>
<td>MM CF/yr/MM BTU/hr/MMCF</td>
</tr>
<tr>
<td></td>
<td>8.56</td>
<td>1020</td>
</tr>
</tbody>
</table>

---

### Emission Factor in lb/MMCF

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>Direct PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>100</td>
<td>5.5</td>
<td>84</td>
</tr>
</tbody>
</table>

**Potential Emission in tons/yr** 6.98E-02 0.28 0.28 2.21E-02 3.68 0.20 3.09

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is filterable and condensable PM2.5 combined.

**Emission Factors for NOx:** Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

### Methodology

All emission factors are based on normal firing.

**HHV MM BTU/HR** 1,000,000 Btu

**HHV MM CF = 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 (MM CF) = Heat Input Capacity (MM BTU/hr) x 8,760 hrs/yr x 1 MM CF/1,020 MMBTU

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

### Hazardous Air Pollutants (HAPs)

#### HAPs - Organics

| Emission Factor in lb/MMCF | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 |
| Potential Emission in tons/yr | 7.72E-05 | 4.41E-05 | 2.76E-03 | 6.62E-02 | 1.25E-04 |

**Total - Organics** 6.92E-02

#### HAPs - Metals

| Emission Factor in lb/MMCF | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.0E-04 | 2.1E-03 |
| Potential Emission in tons/yr | 1.84E-05 | 4.04E-05 | 5.15E-05 | 1.40E-05 | 7.72E-05 |

**Total Metals** 2.01E-04

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.
Appendix A: Emission Calculations
VOC from Plastic Extrusion Line

Company Name: Ilpea Industries, Inc.
Source Location: 1320 S Main Street, Scottsburg, Indiana 47170
Operating Permit Number: F143-32451-00018
Significant Permit Revision Number: 143-41469-00018
Reviewer: Alexandrea Neuzeirling

<table>
<thead>
<tr>
<th>Process</th>
<th>Maximum capacity (lbs/hr)</th>
<th>No. Units</th>
<th>Emissions Factor (lbs/ton)</th>
<th>Total Throughput (lbs/hr)</th>
<th>Total Throughput (tons/hr)</th>
<th>VOC Emissions (lbs/hr)</th>
<th>VOC Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plastic Extrusion Line</td>
<td>400</td>
<td>1</td>
<td>0.3</td>
<td>400.0</td>
<td>0.20</td>
<td>0.06</td>
<td>0.26</td>
</tr>
</tbody>
</table>

Methodology
The VOC emission factor provided by source and is based on the similarity of the process materials.
Total throughput (lbs/hr) = (Maximum capacity of each unit in lbs/hr) * 5 units
Total throughput (tons/hr) = (Total throughput in lbs/hr)/2000 (lbs/ton)
Potential Emissions (lbs/hr) = (E.F. in lbs/ton)* (throughput in ton/hour)
Potential Emissions (tons/yr) = (E.F. in lbs/ton)* (throughput in ton/hour) * 8760 hrs/yr / 2000 lbs/hr
August 21, 2019

Ms. Melissa Binkley
ILPEA Industries, Inc.
745 S. Granger Street
Scottsburg, IN 47170

Re: Public Notice
ILPEA Industries, Inc.
Permit Level: FESOP-Significant Permit Revision
Permit Number: 143-41469-00018

Dear Ms. Binkley:

Enclosed is a copy of your draft FESOP-Significant Permit Revision, 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 Scott County Public Library, 108 S. Main Street in Scottsburg, IN 47170. 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 Alexandria Neuzerling, 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 2-6634 or dial (317) 232-6634.

Sincerely,

Vicki Biddle
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 4/12/19
August 21, 2019

To: Scott County Public Library

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: ILPEA Industries, Inc.
Permit Number: PermitNumber

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 Smidie-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

August 21, 2019
ILPEA Industries, Inc.
143-41469-00018

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](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

<table>
<thead>
<tr>
<th>Name and address of Sender</th>
<th>Type of Mail:</th>
</tr>
</thead>
<tbody>
<tr>
<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>
</tr>
</tbody>
</table>

### Line | Article Number | Name, Address, Street and Post Office Address | Postage | Handing Charges | Act. Value (If Registered) | Insured Value | Due Send if COD | R.R. Fee | S.D. Fee | S.H. Fee | Rest. Del. Fee | Remarks |
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td>Melissa Binkley  Ilpea Industries Inc 745 S Gardner St Scottsburg IN 47170 (Source CAATS)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td>Scott County Health Department 1296 N. Gardner St Scottsburg IN 47170-1400 (Health Department)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
<td>Scottsburg City Council and Mayors Office 2 E. McLain Street Scottsburg IN 47170 (Local Official)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
<td>Scott County Public Library 108 S Main St Scottsburg IN 47170-1892 (Library)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td></td>
<td>Scott County Commissioners 1 E. McClain Ave., County Courthouse Scottsburg IN 47170 (Local Official)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td></td>
<td>Jennifer James Koeng Environmental Compliance Source PO Box 6849 New Albany IN 47151 (Consultant)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Total number of pieces Listed by Sender**: 6

**Total number of Pieces Received at Post Office**: 6

**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 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.