NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Minor Modification to a
Part 70 Operating Permit

for Polar King International, Inc. in Allen County

Minor Permit Modification No.: 003-41994-00232

The Indiana Department of Environmental Management (IDEM) has received an application from Polar King International, Inc., located at 4424 New Haven Ave. Fort Wayne, Indiana 46803, for a minor modification of its Part 70 Operating Permit issued on August 13, 2019. If approved by IDEM’s Office of Air Quality (OAQ), this proposed modification would allow Polar King International, Inc. to make certain changes at its existing source. Polar King International, Inc. has applied to add a wire foam cutting saw to the permit.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g. changes that add or modify synthetic minor emission limits). IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

A copy of the permit application and IDEM’s preliminary findings are available at:
Allen County Library (Main Branch)
900 Library Plaza
Fort Wayne, IN 46802

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

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

How can you participate in this process?

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

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number MPM 003-41994-00232 in all correspondence.

Comments should be sent to:

Mena Mekhail
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Mena Mekhail or (317) 234-7434
Or dial directly: (317) 234-7434
Fax: (317) 232-6749 attn: Mena Mekhail
E-mail: mmekhail@idem.IN.gov

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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/8900.htm.

What will happen after IDEM makes a decision?

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

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

[Signature]
Ghassan Shalabi, Section Chief
Permits Branch
Office of Air Quality
Dear Mr. Bailey:

Polar King International, Inc. was issued Part 70 Operating Permit Renewal No. T003-40301-00232 on August 13, 2019 for a stationary hand/spray layout reinforced plastics and composites processing plant that produces walk-in coolers and freezers located at 4424 New Haven Ave. Fort Wayne, Indiana 46803. An application requesting changes to this permit was received on September 23, 2019. Pursuant to the provisions of 326 IAC 2-7-12, a Minor Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified. The permit references the below listed attachment(s). Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this modification:

Attachment A: 40 CFR 63, Subpart WWWW, NESHAP for Reinforced Plastic Composites Production
Attachment B: 40 CFR 63, Subpart NNNN, NESHAP for Surface Coating of Large Appliances

Previously issued approvals for this source containing these attachments are available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](http://www.in.gov/ai/appfiles/idem-caats/).

Previously issued approvals for this source are 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.


A copy of the permit 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 permit 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. 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).
This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions regarding this matter, please contact Mena Mekhail, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-7434 or (800) 451-6027, and ask for Mena Mekhail or (317) 234-7434.

Sincerely,

Ghassan Shalabi, Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit and Technical Support Document
cc: File – Allen County
   Allen County Health Department
   U.S. EPA, Region 5
   Compliance and Enforcement Branch
Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Polar King International, Inc.
4424 New Haven Ave
Fort Wayne, Indiana 46803

(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. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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 2-7 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.

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<td>Tripurari P. Sinha, Ph. D., Section Chief</td>
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Attachment A:  40 CFR 63, Subpart WWWW, NESHAP for Reinforced Plastic Composites Production
Attachment B:  40 CFR 63, Subpart NNNN, NESHAP for Surface Coating of Large Appliances
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 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary hand/spray layout reinforced plastics and composites processing plant that produces walk-in coolers and freezers.

Source Address: 4424 New Haven Ave, Fort Wayne, Indiana 46803
General Source Phone Number: 2604282500
SIC Code: 3585 (Air-Conditioning and Warm Air Heating Equipment and Commercial and Industrial Refrigeration Equipment)
County Location: Allen
Source Location Status: Attainment for all criteria pollutants
Source Status: Part 70 Operating Permit Program
Minor Source, under PSD
Major Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

(a) One (1) fiberglass fabrication shop for the production of walk-in freezer doors, constructed in 1993, identified as FB-1, with a maximum capacity of producing 0.21 door units per hour; utilizing hand layup resin coat application and fluid impingement technology (FIT) system and controlled techniques for spray gelcoat application with methods, and exhausting inside the plant;

Under the Reinforced Plastics Composites Production NESHAP (40 CFR Part 63, Subpart WWWW), FB-1 is an affected facility.

(b) One (1) fiberglass fabrication shop for the production of walk-in freezer frames, constructed in 1993, identified as FB-2, with a maximum capacity of producing 0.11 walk-in refrigeration units per hour, utilizing chop guns equipped with Fluid Impingement Technology (FIT) for resin and gelcoat application, and exhausting inside the plant;

Under the Reinforced Plastics Composites Production NESHAP (40 CFR Part 63, Subpart WWWW), FB-2 is an affected facility.

(c) One (1) fiberglass fabrication shop for the production of walk-in freezer floor panels, constructed in 1993, identified as FB-3, with a maximum capacity of producing 0.5 panels per hour, utilizing hand layup gelcoat application, and exhausting inside the plant; and

Under the Reinforced Plastics Composites Production NESHAP (40 CFR Part 63, Subpart WWWW), FB-3 is an affected facility.

(d) One (1) surface coating operation, constructed in 1993, identified as SC-1, with a maximum capacity of coating 0.67 finished walk-in fiberglass freezer units per hour, utilizing hand-roll application, and exhausting inside the plant.

Under the Surface Coating of Large Appliances NESHAP (40 CFR Part 63, Subpart
NNNN), SC-1 is an affected facility.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

(a) One (1) natural gas-fired radiant heater, constructed prior to 2008, rated at 100,000 Btu per hour;

(b) Other categories with emissions below insignificant thresholds:

(1) One (1) metal inert gas (MIG) welder, constructed prior to 1996, with PM-10 emission less than five (5) pounds per hour or twenty-five (25) pounds per day.

(2) One (1) woodworking shop, constructed prior to 1996 with an annual throughput of 38.7 tons of wood per year and unrestricted potential emissions of PM/PM 10 less than 1 pound per hour or less than 1 ton per year

(3) Hand-held trimming and grinding operations, constructed prior to 1996, with PM-10 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day

(c) One (1) panel cutting saw, constructed in April of 2005, with a maximum throughput of 1,388 pounds per hour, used only to deflash or for part separation if needed. The panel saw is controlled by one (1) Delta 50-760 baghouse with an outlet grain loading of less than 0.03 grains/scf, and a flow rate of 1,100 scf/min.

(d) One (1) wire foam cutting saw, approved in 2019 for construction, with a maximum capacity of 0.375 buns per hour, using a dust collector as control, and exhausting indoors.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).
SECTION B  GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

(a) This permit, T 003-40301-00232, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, 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 2-7-7][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 2-7-5(5)]

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 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(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 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), 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) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(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 2-7-5(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(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.11 Emergency Provisions [326 IAC 2-7-16]

(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.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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 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

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 2-7-5(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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 (Malfuctions). 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 2-7-4(c)(8) 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 2-7 and any other applicable rules.

(g) 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.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T 003-40301-00232 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(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 2-7-9(a)(3)]

(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 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(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 2-7-4. 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(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

(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 2-7 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 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (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 preconstruction approval required by 326 IAC 2-7-10.5 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 2-7-20(b)(1) and (c)(1). 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 2-7-20(b)(1) and (c)(1).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

1. A brief description of the change within the source;
2. The date on which the change will occur;
3. Any change in emissions; and
4. Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

(c) Emission Trades [326 IAC 2-7-20(c)]
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 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

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

B.20 Source Modification Requirement [326 IAC 2-7-10.5]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]
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 Part 70 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 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 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 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.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within 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) Except as provided in 326 IAC 2-7-19(e), 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.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][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 2-7-5(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 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.3 Open Burning [326 IAC 4-1][IC 13-17-9]

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

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

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

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

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

Testing Requirements  [326 IAC 2-7-6(1)]

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

Compliance Requirements  [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements  [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

(a) For new units:

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:

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 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, 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.10 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(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 2-7-5][326 IAC 2-7-6]

C.11 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.12 Risk Management Plan [326 IAC 2-7-5(11)][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.13 Response to Excursions or Exceedances [326 IAC 2-7-5][326 IAC 2-7-6]

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

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.
e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

1. Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
2. Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(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 Part 70 permit.

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 dates 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.17 General Reporting Requirements [326 IAC 2-7-5(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). 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.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

Emissions Unit Description:

(a) One (1) fiberglass fabrication shop for the production of walk-in freezer doors, constructed in 1993, identified as FB-1, with a maximum capacity of producing 0.21 door units per hour; utilizing hand layup resin coat application and fluid impingement technology (FIT) system and controlled techniques for spray gelcoat application with methods, and exhausting inside the plant;

[Under the Reinforced Plastics Composites Production NESHAP (40 CFR Part 63, Subpart WWWW), FB-1 is an affected facility.]

(b) One (1) fiberglass fabrication shop for the production of walk-in freezer frames, constructed in 1993, identified as FB-2, with a maximum capacity of producing 0.11 walk-in refrigeration units per hour, utilizing chop guns equipped with Fluid Impingement Technology (FIT) for resin and gelcoat application, and exhausting inside the plant;

[Under the Reinforced Plastics Composites Production NESHAP (40 CFR Part 63, Subpart WWWW), FB-2 is an affected facility.]

(c) One (1) fiberglass fabrication shop for the production of walk-in freezer floor panels, constructed in 1993, identified as FB-3, with a maximum capacity of producing 0.5 panels per hour, utilizing hand layup gelcoat application, and exhausting inside the plant; and

[Under the Reinforced Plastics Composites Production NESHAP (40 CFR Part 63, Subpart WWWW), FB-3 is an affected facility.]

(d) One (1) surface coating operation, constructed in 1993, identified as SC-1, with a maximum capacity of coating 0.67 finished walk-in fiberglass freezer units per hour, utilizing hand-roll application, and exhausting inside the plant.

[Under the Surface Coating of Large Appliances NESHAP (40 CFR Part 63, Subpart NNNN), SC-1 is an affected facility.]

(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 2-7-5(1)]

D.1.1 VOC Minor Limit [326 IAC 8-1-6]

The total VOC usage including coatings, dilution solvents, and cleaning solvents at the surface coating operation identified as SC-1 shall be limited to less than 25.0 tons VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit shall limit the VOC emissions, from the surface coating operation identified as SC-1 to less than 25.0 tons per twelve consecutive month period and shall render the requirements of 326 IAC 8-1-6 (General Reduction Requirements) not applicable to this emission unit.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities. 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 7 5(1)]

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4][326 IAC 8-1-2]

In order to assure compliance, the VOC content limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements  [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

D.1.4 Reinforced Plastic Composites Production 326 IAC [20-56-2]

Pursuant to 326 IAC 20-56-2:

(a) Each owner or operator shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and applications that could result in excess emissions if performed improperly according to the following schedule:

(1) All personnel hired shall be trained within thirty (30) days of hiring;
(2) To ensure training goals listed in Condition D.1.4(b) are maintained, all personnel shall be given refresher training annually; and
(3) Personnel who have been trained by another owner or operator subject to this rule are exempt from Condition D.1.4(a)(1) if written documentation that the employee's training is current is provided to the new employer.

(b) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(1) Appropriate application techniques;
(2) Appropriate equipment cleaning procedures; and
(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

(c) The Permittee shall maintain the following training records on site and make them available for inspection and review:

(1) A copy of the current training program;
(2) A list of the following:
   (A) All current personnel, by name, that are required to be trained; and
   (B) The date the person was trained or date of most recent refresher training, whichever is later.

(d) Records of prior training programs and former personnel are not required to be maintained.

Record Keeping and Reporting Requirements  [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D.1.5 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limits established in Condition D. 1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used less water.
(2) The amount of coating material and solvent used on a daily basis.
(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings (dilution) and those used as cleanup solvent.

(3) The volume weighted average VOC content of the coatings used for each day, when using coatings that are above 2.8 pounds per gallon limit.

(4) The daily cleanup solvent usage; and

(5) The total VOC usage for each month.

(b) To document the compliance status with Condition D.1.4 the Permittee shall maintain the following training records:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.1.6 Reporting Requirements

A quarterly report and a quarterly summary of the information to document the compliance status with Condition D.1.1, including any supporting emission calculations performed in accordance with Condition D.1.3, shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.

The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official,” as defined by 326 IAC 2-7-1(35).
SECTION D.2  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activity

(c) One (1) panel cutting saw, constructed in April of 2005, with a maximum throughput of 1,388 pounds per hour, used only to deflash or for part separation if needed. The panel saw is controlled by one (1) Delta 50-760 baghouse with an outlet grain loading of less than 0.03 grains/scf, and a flow rate of 1,100 scf/min.

(d) One (1) wire foam cutting saw, approved in 2019 for construction, with a maximum capacity of 0.375 buns per hour, using a dust collector as control, and exhausting indoors.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the panel cutting saw and wire foam cutting saw shall not exceed the values shown in the table below:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>P (ton/hr)</th>
<th>E (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Panel cutting saw</td>
<td>1,388</td>
<td>3.21</td>
</tr>
<tr>
<td>Wire foam cutting saw</td>
<td>0.066</td>
<td>0.66</td>
</tr>
</tbody>
</table>

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

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

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for this facility and its 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 2-7-5(1)]

D.2.3 Particulate Control (PM)

In order to assure compliance with Condition D.2.1, the baghouse and Dust Collector for particulate control shall be in operation and control emissions from the panel cutting saw and wire foam cutting saw, respectively, at all times the panel cutting saw and wire foam cutting saw is are in operation.

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.
Compliance Monitoring Requirements [326 IAC 2 7 5(1)] [326 IAC 2 7 6(1)]

D.2.4 Visible Emissions Notations - Baghouse

(a) Visible emission notations of baghouse stack exhausts shall be performed once per day during normal daylight operations, while the panel cutting saw and wire foam cutting saw are exhausting to the outdoors. 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 a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.2.5 Broken or Failed Bag Detection - Baghouse

(a) For a single compartment baghouse 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 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).

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.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.6 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.4, the Permittee shall maintain daily records of the visible emission notations of the emission units stack exhaust, taken while the panel cutting saw and wire foam cutting saw are exhausting to the outdoors. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.
SECTION E.1 NESHAP

Emissions Unit Description:

(a) One (1) fiberglass fabrication shop for the production of walk-in freezer doors, constructed in 1993, identified as FB-1, with a maximum capacity of producing 0.21 door units per hour; utilizing hand layup resin coat application and fluid impingement technology (FIT) system and controlled techniques for spray gelcoat application with methods, and exhausting inside the plant;

[Under the Reinforced Plastics Composites Production NESHAP (40 CFR Part 63, Subpart WWWW), FB-1 is an affected facility.]

(b) One (1) fiberglass fabrication shop for the production of walk-in freezer frames, constructed in 1993, identified as FB-2, with a maximum capacity of producing 0.11 walk-in refrigeration units per hour, utilizing chop guns equipped with Fluid Impingement Technology (FIT) for resin and gelcoat application, and exhausting inside the plant;

[Under the Reinforced Plastics Composites Production NESHAP (40 CFR Part 63, Subpart WWWW), FB-2 is an affected facility.]

(c) One (1) fiberglass fabrication shop for the production of walk-in freezer floor panels, constructed in 1993, identified as FB-3, with a maximum capacity of producing 0.5 panels per hour, utilizing hand layup gelcoat application, and exhausting inside the plant; and

[Under the Reinforced Plastics Composites Production NESHAP (40 CFR Part 63, Subpart WWWW), FB-3 is an affected facility.]

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]


(a) Pursuant to 40 CFR 63.1, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart WWWW.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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 Permittee shall comply with the following provisions of CFR Part 63, Subpart WWWW (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 20-56, for the affected source, as follows:
(1) 40 CFR 63.5780;
(2) 40 CFR 63.5785(a);
(3) 40 CFR 63.5790(a)(b)(c);
(4) 40 CFR 63.5795(a)(b);
(5) 40 CFR 63.5796;
(6) 40 CFR 63.5797;
(7) 40 CFR 63.5798;
(8) 40 CFR 63.5799(b)(c);
(9) 40 CFR 63.5800;
(10) 40 CFR 63.5805(b);
(11) 40 CFR 63.5810(a)(b)(c)(d);
(12) 40 CFR 63.5835(a);
(13) 40 CFR 63.5840;
(14) 40 CFR 63.5860(a);
(15) 40 CFR 63.5895(c)(d);
(16) 40 CFR 63.5900(a)(2)(3)(4)(b)(c)(e);
(17) 40 CFR 63.5905;
(18) 40 CFR 63.5910(a)(b)(c)(d)(g)(h)(i);
(19) 40 CFR 63.5915(a)(c)(d);
(20) 40 CFR 63.5920;
(21) 40 CFR 63.5925;
(22) 40 CFR 63.5930;
(23) 40 CFR 63.5935;
(24) Tables 1, 2, 3, 4, 7, 8, 9, 13, 14 and 15;
(25) Appendix A.
SECTION E.2 NESHAP

**Emissions Unit Description:**

(d) One (1) surface coating operation, constructed in 1993, identified as SC-1, with a maximum capacity of coating 0.67 finished walk-in fiberglass freezer units per hour, utilizing hand-roll application, and exhausting inside the plant.

[Under the Surface Coating of Large Appliances NESHAP (40 CFR Part 63, Subpart NNNN), SC-1 is an affected facility.]

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

---

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]**


(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR 63 Subpart NNNN.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

**E.2.2 National Emissions Standard for Hazardous Air Pollutants for Surface Coating of Large Appliances [40 CFR Part 63, Subpart NNNN][326 IAC 20-63]**

The Permittee shall comply with the following provisions of CFR Part 63, Subpart NNNN (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 20-63, for the affected source, as follows:

1. 40 CFR 63.4080;
2. 40 CFR 63.4081(a),(b),(c),(d);
3. 40 CFR 63.4082(a),(b),(c),(d),(e);
4. 40 CFR 63.4083(b),(d);
5. 40 CFR 63.4090(a);
6. 40 CFR 63.4091(a)(b);
7. 40 CFR 63.4092(a);
8. 40 CFR 63.4093(a);
9. 40 CFR 63.4100(a)(1)(b);
10. 40 CFR 63.4101;
11. 40 CFR 63.4110(a)(1)(a)(2)(b)(1) through (b)(8);
12. 40 CFR 63.4120(a)(b)(c)(d)(e);
13. 40 CFR 63.4130(a)(b)(c)(d)(e)(f)(g)(h)(j);
14. 40 CFR 63.4131;
15. 40 CFR 63.4140;
16. 40 CFR 63.4141;
17. 40 CFR 63.4142;
18. 40 CFR 63.4150.
(19) 40 CFR 63.4151.
(20) 40 CFR 63.4152.
(21) 40 CFR 63.4161(c)(d)(e)(j)(k)(l);
(22) 40 CFR 63.4163(a)(b)(d)(f)(h)(j);
(23) 40 CFR 63.4180;
(24) 40 CFR 63.4181;
(25) Tables 2, 3, and 4.
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Polar King International, Inc.
Source Address: 4424 New Haven Ave, Fort Wayne, Indiana 46803
Part 70 Permit No.: T 003-40301-00232

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:
Phone:
Date:
PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Polar King International, Inc.
Source Address: 4424 New Haven Ave, Fort Wayne, Indiana 46803
Part 70 Permit No.: T 003-40301-00232

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 2-7-16.

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

<table>
<thead>
<tr>
<th>Date/Time Emergency started:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date/Time Emergency was corrected:</td>
<td></td>
</tr>
<tr>
<td>Was the facility being properly operated at the time of the emergency?</td>
<td>Y</td>
</tr>
<tr>
<td>Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other:</td>
<td></td>
</tr>
<tr>
<td>Estimated amount of pollutant(s) emitted during emergency:</td>
<td></td>
</tr>
<tr>
<td>Describe the steps taken to mitigate the problem:</td>
<td></td>
</tr>
<tr>
<td>Describe the corrective actions/response steps taken:</td>
<td></td>
</tr>
<tr>
<td>Describe the measures taken to minimize emissions:</td>
<td></td>
</tr>
<tr>
<td>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:</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

Part 70 Quarterly Report

Source Name: Polar King International, Inc.
Source Address: 4424 New Haven Ave, Fort Wayne, Indiana 46803
Part 70 Permit No.: T 003-40301-00232
Facility: Surface Coating Operation (SC-1)
Parameter: VOC
Limit: VOC usage shall be limited to less than 25 tons per twelve (12) consecutive month period.

QUARTER: _____________ YEAR: _______________

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>This Month (tons/yr)</td>
<td>Previous 11 Months (tons/yr)</td>
<td>12 Month Total (tons/yr)</td>
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</tbody>
</table>

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
   Deviation has been reported on:

Submitted by: ____________________________
Title / Position: ________________________
Signature: _____________________________
Date: _________________________________
Phone: _______________________________
**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE AND ENFORCEMENT BRANCH**  
**PART 70 OPERATING PERMIT**  
**QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Polar King International, Inc.  
Source Address: 4424 New Haven Ave, Fort Wayne, Indiana 46803  
Part 70 Permit No.: T 003-40301-00232  

Months: _________ to _________ Year: _________

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>Date of Deviation:</th>
<th>Duration of Deviation:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Deviations:</td>
<td></td>
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</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
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<tr>
<td>Response Steps Taken:</td>
<td></td>
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</tbody>
</table>

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

<table>
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<th>Date of Deviation</th>
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<th>Number of Deviations</th>
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<tr>
<th>Probable Cause of Deviation</th>
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<tr>
<th>Response Steps Taken</th>
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<table>
<thead>
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<tbody>
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</table>

<table>
<thead>
<tr>
<th>Probable Cause of Deviation</th>
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<tbody>
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<td></td>
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</table>

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

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## Permit Requirement (specify permit condition #)

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

<table>
<thead>
<tr>
<th>Number of Deviations</th>
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<tbody>
<tr>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Probable Cause of Deviation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Response Steps Taken</th>
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</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

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Form Completed by: ________________________________

Title / Position: ________________________________

Date: ________________________________

Phone: ________________________________
Source Description and Location

<table>
<thead>
<tr>
<th>Source Name:</th>
<th>Polar King International, Inc.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Location:</td>
<td>4424 New Haven Ave. Fort Wayne, IN 46803</td>
</tr>
<tr>
<td>County:</td>
<td>Allen</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>3585 (Air-Conditioning and Warm Air Heating Equipment and Commercial and Industrial Refrigeration Equipment)</td>
</tr>
<tr>
<td>Operation Permit No.:</td>
<td>T 003-40301-00232</td>
</tr>
<tr>
<td>Operation Permit Issuance Date:</td>
<td>August 13, 2019</td>
</tr>
<tr>
<td>Minor Source Modification No.:</td>
<td>003-41956-00232</td>
</tr>
<tr>
<td>Minor Permit Modification No.:</td>
<td>003-41994-00232</td>
</tr>
<tr>
<td>Permit Reviewer:</td>
<td>Mena Mekhail</td>
</tr>
</tbody>
</table>

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. 003-40301-00232 on August 13, 2019. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Allen 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 5, 2005, for the 2012 annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour 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. Allen 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) PM₂.₅
Allen County has been classified as attainment for PM₂.₅. Therefore, direct PM₂.₅, SO₂, and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
(e) Other Criteria Pollutants
Allen County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants (PM, PM10 and CO) 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_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court’s decision. U.S. EPA’s guidance states that U.S. EPA will no longer require PSD or Title V permits for sources “previously classified as ‘Major’ based solely on greenhouse gas emissions.”

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

### Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, 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.
### Source-Wide Emissions Prior to Modification (ton/year)

<table>
<thead>
<tr>
<th></th>
<th>PM¹</th>
<th>PM₁₀²</th>
<th>PM₂.₅thers</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP³</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire</td>
<td>43.73</td>
<td>43.73</td>
<td>43.73</td>
<td>0.00</td>
<td>0.04</td>
<td>50.11</td>
<td>0.00</td>
<td>16.99</td>
<td>22.29</td>
</tr>
<tr>
<td>Source Excluding</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(Styrene)</td>
<td></td>
</tr>
<tr>
<td>Fugitive Emissions*</td>
<td></td>
<td></td>
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<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Title V Major Source</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
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<td>25</td>
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<tr>
<td>Thresholds</td>
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<td></td>
<td></td>
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<tr>
<td>PSD Major Source</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
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<td>Thresholds</td>
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<td></td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂.₅, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM₂.₅ listed is direct PM₂.₅.
³Single highest source-wide HAP
*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 a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are equal to or greater than ten (10) tons per year for a single HAP.

(c) These emissions are based on the TSD of a Part 70 Operating Permit Renewal No. 003-40301-00232, issued on August 13, 2019.

### Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Polar King International, Inc. on September 23, 2019, relating to addition of wire foam cutting saw to the permit.

The following is a list of the new emission unit:

(a) One (1) wire foam cutting saw, approved in 2019 for construction, with a maximum capacity of 0.375 buns per hour, using a dust collector as control, and exhausting indoors.

### Enforcement Issues

There are no pending enforcement actions related to this modification.

### Emission Calculations

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

### Permit Level Determination – Part 70 Modification to an Existing Source

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as "the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency."
The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. 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>Process / Emission Unit</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_X$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wire Foam Cutting Saw</td>
<td>9.45</td>
<td>0.94</td>
<td>0.94</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>Total PTE Before Controls of the New Emission Units:</strong></td>
<td><strong>9.45</strong></td>
<td><strong>0.94</strong></td>
<td><strong>0.94</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.00</strong></td>
<td><strong>0.00</strong></td>
</tr>
</tbody>
</table>

1PM$_{2.5}$ listed is direct PM$_{2.5}$.
2Single highest HAP.

Appendix A of this TSD reflects the detailed potential emissions of the modification.

(a) Approval to Construct

Pursuant to 326 IAC 2-7-10.5(e)(1)(A), a Minor Source Modification is required because this modification has the potential to emit PM that is less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year.

(b) Approval to Operate

Pursuant to 326 IAC 2-7-12(b)(1), this change to the permit is being made through a Minor Permit Modification because:

(A) The modification does not violate any applicable requirement.
(B) The modification does not involve significant changes to existing monitoring, reporting or record keeping requirements in the Part 70 permit.
(C) The modification does not require or change:
   (i) a case-by-case determination of an emission limitation or other standard;
   (ii) source specific determination for temporary sources of ambient impacts; or
   (iii) visibility or increment analysis.
(D) The modification does not seek to establish or change a Part 70 permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. This includes the following:
   (i) A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA.
   (ii) An alternative emissions limit approved under regulations promulgated under Section 112(i)(5) of the CAA.
(E) This change is not a modification under any provision of Title I of the CAA.
(F) This change is not required by the Part 70 program to be processed as a significant modification.

PTE of the Entire Source After Issuance of the Part 70 Modification

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 Part 70 source and/or permit modification, 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.
### Federal Rule Applicability Determination

There is no change in the federal rule applicability due to the modification.

### Compliance Assurance Monitoring (CAM):

The requirements of 40 CFR Part 64, CAM, are not applicable to the new unit as part of this modification because it has no control device associated with it.

### State Rule Applicability - Entire Source

There is no change in the state rule applicability due to the modification.

### State Rule Applicability – Individual Facilities

Due to this modification, state rule applicability has been reviewed as follows:

#### Wire Foam Cutting Saw

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

Pursuant to 326 IAC 6-3-2(a), the requirements of 326 IAC 6-3-2 are applicable to the wire foam cutting saw, since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the wire foam cutting saw shall not exceed 0.66 pounds per hour when operating at a process weight rate of 0.066 tons per hour. The pound per hour limitation was calculated with 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

The dust collector shall be in operation at all times the wire foam cutting saw is in operation, in order to comply with this limit.

### Compliance Determination and Monitoring Requirements

There are no new or modified compliance requirements included with this modification.

### Proposed Changes

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

The following changes listed below are due to the proposed modification. Deleted language appears as strikethrough text and new language appears as **bold** text (these changes may include Title I changes):

(1) Condition A.3 of the permit has been modified to include the new emission unit.

<table>
<thead>
<tr>
<th>A.3</th>
<th>Insignificant Activities {326 IAC 2-7-1(21)}{326 IAC 2-7-4(c)}{326 IAC 2-7-5(14)}</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):</td>
</tr>
<tr>
<td></td>
<td>***</td>
</tr>
<tr>
<td></td>
<td>(d) One (1) wire foam cutting saw, approved in 2019 for construction, with a maximum capacity of 0.375 buns per hour, using a dust collector as control, and exhausting indoors.</td>
</tr>
</tbody>
</table>

(2) Section D.2 of the permit has been modified to include the new emission unit and requirements.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

| *** |
| (d) | One (1) wire foam cutting saw, approved in 2019 for construction, with a maximum capacity of 0.375 buns per hour, using a dust collector as control, and exhausting indoors. |
| *** |

Emission Limitations and Standards {326 IAC 2-7-5(1)}

D.2.1 Particulate Emission Limitations for Manufacturing Processes {326 IAC 6-3-2} Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the panel saw shall not exceed 3.21 pounds per hour when operating at a process weight rate of 1,388 pounds per hour.
Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the panel cutting saw and wire foam cutting saw shall not exceed the values shown in the table below:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>P (ton/hr)</th>
<th>E (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Panel cutting saw</td>
<td>1,388</td>
<td>3.21</td>
</tr>
<tr>
<td>Wire foam cutting saw</td>
<td>0.066</td>
<td>0.66</td>
</tr>
</tbody>
</table>

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

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

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

D.2.3 Particulate Control (PM)

In order to assure compliance with Condition D.2.1, the baghouse and Dust Collector for particulate control shall be in operation and control emissions from the panel cutting saw and wire foam cutting saw, respectively, at all times the panel cutting saw and wire foam cutting saw are in operation.

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.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

D.2.4 Visible Emissions Notations - Baghouse

(a) Visible emission notations of baghouse stack exhausts shall be performed once per day during normal daylight operations, while the panel cutting saw and wire foam cutting saw are exhausting to the outdoors. A trained employee shall record whether emissions are normal or abnormal.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.6 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.4, the Permittee shall maintain daily records of the visible emission notations of the emission units stack exhaust, taken while the panel cutting saw and wire foam cutting saw are exhausting to the outdoors. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).

(b) 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 September 23, 2019.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 003-41956-00232. The operation of this proposed modification shall be subject to the conditions of the attached proposed Minor Permit Modification No. 003-41994-00232.

The staff recommends to the Commissioner that the Part 70 Minor Source Modification and Minor Permit Modification be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Mena Mekhail, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-7434 or (800) 451-6027, and ask for Mena Mekhail or (317) 234-7434.

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

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

Emission Summary

Company Name: Polar King International, Inc.
Address: 4424 New Haven Ave, Fort W
Minor Source Modification: T003-41956-00232
Minor Permit Modification: T003-41994-00232
Reviewer: Mena Mekhail

Uncontrolled Potential Emissions (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>
<th>Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>One (1) Surface Coating Operation (SC-1)</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>35.7</td>
<td>0.00</td>
<td>3.79</td>
<td>3.72</td>
</tr>
<tr>
<td>Fiberglass Fabrication, FB-1</td>
<td>0.34</td>
<td>0.34</td>
<td>0.34</td>
<td>0.00</td>
<td>0.00</td>
<td>0.40</td>
<td>0.00</td>
<td>16.99</td>
<td>16.99</td>
</tr>
<tr>
<td>Fiberglass Fabrication, FB-2</td>
<td>9.98</td>
<td>9.98</td>
<td>9.98</td>
<td>0.00</td>
<td>0.00</td>
<td>15.16</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Fiberglass Fabrication, FB-3</td>
<td>4.21</td>
<td>4.21</td>
<td>4.21</td>
<td>0.00</td>
<td>0.00</td>
<td>1.42</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Catalyst</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>8.19</td>
<td>0.00</td>
<td>2.66</td>
<td>2.66</td>
</tr>
<tr>
<td>Panel Cutting Saw</td>
<td>24.78</td>
<td>24.78</td>
<td>24.78</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Woodworking</td>
<td>4.38</td>
<td>4.38</td>
<td>4.38</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Welding/Cutting</td>
<td>0.04</td>
<td>0.04</td>
<td>0.04</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Wire Foam Cutting Saw</td>
<td>9.45</td>
<td>0.94</td>
<td>0.94</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Total Emissions</td>
<td>53.18</td>
<td>44.68</td>
<td>44.68</td>
<td>0.00</td>
<td>0.04</td>
<td>60.92</td>
<td>0.00</td>
<td>23.44</td>
<td>16.99</td>
</tr>
</tbody>
</table>

Limited Potential Emissions (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>
<th>Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>One (1) Surface Coating Operation (SC-1)</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>24.90</td>
<td>0.00</td>
<td>2.65</td>
<td>2.59</td>
</tr>
<tr>
<td>Fiberglass Fabrication, FB-1</td>
<td>0.34</td>
<td>0.34</td>
<td>0.34</td>
<td>0.00</td>
<td>0.00</td>
<td>0.40</td>
<td>0.00</td>
<td>16.99</td>
<td>16.99</td>
</tr>
<tr>
<td>Fiberglass Fabrication, FB-2</td>
<td>9.98</td>
<td>9.98</td>
<td>9.98</td>
<td>0.00</td>
<td>0.00</td>
<td>15.16</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Fiberglass Fabrication, FB-3</td>
<td>4.21</td>
<td>4.21</td>
<td>4.21</td>
<td>0.00</td>
<td>0.00</td>
<td>1.42</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Catalyst</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>8.19</td>
<td>0.00</td>
<td>2.66</td>
<td>2.66</td>
</tr>
<tr>
<td>Panel Cutting Saw</td>
<td>24.78</td>
<td>24.78</td>
<td>24.78</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Woodworking</td>
<td>4.38</td>
<td>4.38</td>
<td>4.38</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Welding/Cutting</td>
<td>0.04</td>
<td>0.04</td>
<td>0.04</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Wire Foam Cutting Saw</td>
<td>9.45</td>
<td>0.94</td>
<td>0.94</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Total Emissions</td>
<td>53.18</td>
<td>44.68</td>
<td>44.68</td>
<td>0.00</td>
<td>0.04</td>
<td>50.11</td>
<td>0.00</td>
<td>22.29</td>
<td>16.99</td>
</tr>
</tbody>
</table>
Appendix A: Emission Calculations
Minor Source Modification

Company Name: Polar King International, Inc.
Address: 4424 New Haven Ave, Fort Wayne, IN 46803
Minor Source Modification: T003-41956-00232
Minor Permit Modification: T003-41994-00232
Reviewer: Mena Mekhail

New Unit:

<table>
<thead>
<tr>
<th>Process/ Emission Unit</th>
<th>PM</th>
<th>PM10*</th>
<th>PM2.5*</th>
<th>SO$_2$</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Worst Single HAP (Cobalt)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wire Foam Cutting Saw</td>
<td>9.45</td>
<td>0.94</td>
<td>0.94</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Total PTE of new unit</td>
<td>9.45</td>
<td>0.94</td>
<td>0.94</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>
Appendix A: Emission Calculations

From Surface Coating Operations - SC-1

Company Name: Polar King International, Inc.
Address: 4424 New Haven Ave, Fort Wayne, IN 46803

Minor Source Modification: T003-41956-00232
Minor Permit Modification: T003-41994-00232
Reviewer: Mena Mekhail

### Material (as applied) Process

<table>
<thead>
<tr>
<th>Material (as applied)</th>
<th>Process</th>
<th>Density (lb/gal)</th>
<th>Weight % HOD (H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Non-Vol (Solids)</th>
<th>Gal of Mat (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Pounds VOC per gal of coating less water</th>
<th>Pounds VOC per gal of coating</th>
<th>VOC lbs/hr</th>
<th>VOC lbs/day</th>
<th>PTE VOC tons/yr</th>
<th>Factor VOC lbs/hr</th>
<th>Particulate potential ton/yr</th>
<th>PTE VOC tons/yr</th>
<th>lb VOC/gal solids</th>
</tr>
</thead>
<tbody>
<tr>
<td>Industrial Enamel</td>
<td>F/A Paint (1)</td>
<td>9.30</td>
<td>42.00%</td>
<td>5.00%</td>
<td>0.00%</td>
<td>61.00%</td>
<td>3.000</td>
<td>0.67</td>
<td>4.00</td>
<td>4.00</td>
<td>8.04</td>
<td>192.91</td>
<td>35.21</td>
<td>0.00</td>
<td>6.65</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td>Industrial Enamel</td>
<td>Mach. grey paint (2)</td>
<td>8.03</td>
<td>50.50%</td>
<td>0.00%</td>
<td>50.50%</td>
<td>61.00%</td>
<td>3.000</td>
<td>0.67</td>
<td>4.06</td>
<td>4.06</td>
<td>8.15</td>
<td>195.62</td>
<td>35.70</td>
<td>0.00</td>
<td>6.65</td>
<td>100%</td>
<td></td>
</tr>
</tbody>
</table>

**Total Potential Emissions:**

8.15 195.62 35.70 0.00 6.65

**Potential Emissions (controlled):**

<table>
<thead>
<tr>
<th>Usage Limitation:</th>
<th>Limited</th>
</tr>
</thead>
<tbody>
<tr>
<td>VOC lbs/hr</td>
<td>30.2521</td>
</tr>
<tr>
<td>VOC tons/yr</td>
<td>0.00</td>
</tr>
<tr>
<td>PM lbs/hr</td>
<td>5.48</td>
</tr>
<tr>
<td>PM tons/yr</td>
<td>131.51</td>
</tr>
<tr>
<td>VOC lbs/day</td>
<td>24.90</td>
</tr>
<tr>
<td>PM</td>
<td>0.00</td>
</tr>
</tbody>
</table>

VOC usage at SC-1 shall be limited to < 25.0 tons per twelve (12) consecutive month period to avoid 326 IAC 8-1-6 (General Reduction Requirements). This limit is equivalent to limiting usage of their Machine Grey Enamel by 30.2521%.

(1) The F/A paint represents the average of all coatings in the series of '4500' series of paints used by Polar King International, Inc.

(2) The machine grey paint is the coating in the 4500 series with the worst-case VOC content. This coating was used to calculate potential VOC emissions.

**Pounds of VOC per Gallon Coating less Water**

\[
Pounds\ of\ VOC\ per\ Gallon\ Coating\ less\ Water = \frac{Density\ (lb/gal) \times Weight\ %\ Organics}{1 - Volume\ %\ Water}
\]

**Pounds of VOC per Gallon Coating**

\[
Pounds\ of\ VOC\ per\ Gallon\ Coating = \frac{Density\ (lb/gal) \times Weight\ %\ Organics}{(1 - Volume\ %\ Water)}
\]

**Potential VOC Pounds per Day**

\[
Potential\ VOC\ Pounds\ per\ Day = Pounds\ of\ VOC\ per\ Gallon\ coating\ (lb/gal) \times Gal\ of\ Material\ (gal/unit) \times Maximum\ (units/hr) \times (24\ hr/day)
\]

**Potential VOC Tons per Year**

\[
Potential\ VOC\ Tons\ per\ Year = Pounds\ of\ VOC\ per\ Gallon\ coating\ (lb/gal) \times Gal\ of\ Material\ (gal/unit) \times Maximum\ (units/hr) \times (8760\ hrs/yr) \times (1\ ton/2000\ lbs)
\]

**Particulate Potential Tons per Year**

\[
Particulate\ Potential\ Tons\ per\ Year = (units/hour) \times (gal/unit) \times (lbs/gal) \times (1 - Weight\ %\ Volatiles) \times (1 - Transfer\ efficiency) \times (8760\ hrs/yr) \times (1\ ton/2000\ lbs)
\]

**Controlled emission rate = uncontrolled emission rate \times (1 - control efficiency)**

**Surface Coating SC-1**

<table>
<thead>
<tr>
<th>Material (as applied)</th>
<th>Density (Lb/Gal)</th>
<th>Gal of Mat (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Weight % Xylene</th>
<th>Weight % Dime. Phthal.</th>
<th>Weight % Benzene</th>
<th>Weight % Styrene</th>
<th>PTE Xylene (ton/yr)</th>
<th>PTE Dimethyl Phthalate (ton/yr)</th>
<th>PTE Benzene (ton/yr)</th>
<th>Styrene (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Industrial Enamel (1)</td>
<td>8.45</td>
<td>3.000</td>
<td>0.67</td>
<td>5.00%</td>
<td>0.00%</td>
<td>0.10%</td>
<td>0.00%</td>
<td>3.72</td>
<td>0.00</td>
<td>0.07</td>
<td>0.00</td>
</tr>
<tr>
<td>Total of each HAP</td>
<td>3.72</td>
<td>0.00</td>
<td>0.07</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>3.72</td>
<td>0.00</td>
<td>0.07</td>
<td>0.00</td>
</tr>
<tr>
<td>Total HAP Potential Emissions (tons/yr)</td>
<td>3.79</td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Single HAP Emissions (tons/yr)</td>
<td>3.72 Xylene</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Limited HAP for SC-1**

(1) Coating #4587: Industrial Enamel (1) is an Intermediate tint base that has the worst case HAP content. It was used to calculate potential worst-case HAP emissions from surface coating (SC-1)

**Limited HAP for SC-1**

Based on a 30.2521% usage limit, the limited potential to emit HAPs from surface coating is equal to 3.72(1 - 0.3025) + 0.07(1 - 0.3025) = 2.65 tons/yr Total HAPs, 2.59 tons/yr Single HAP.

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
Appendix A: Emissions Calculations
Form DD: Reinforced Plastics and Composites
Open Molding Operations*

Resin and Gel Usage

Company Name: Polar King International, Inc.
Address: 4424 New Haven Ave, Fort Wayne, IN 46803
Minor Source Modification: T003-41955-00232
Minor Permit Modification: T003-41994-00232
Reviewer: Mena Mekhail

<table>
<thead>
<tr>
<th>Emission Unit ID</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Monomer</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum usage (unit/hour)</th>
<th>UEF (lbs monomer/ton resin or gel)</th>
<th>Potential VOC (lb/hr)</th>
<th>Potential VOC/HAP (tons/yr)</th>
<th>Transfer Efficiency</th>
<th>Potential PM/PM10/PM2.5 (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>FB-1 Resin Non-Spray Layup</td>
<td>9.43</td>
<td>33.50%</td>
<td>1.000</td>
<td>0.21</td>
<td>72.50</td>
<td>0.0718</td>
<td>1.72</td>
<td>0.31</td>
<td>100%</td>
</tr>
<tr>
<td>FB-1 Gel Coat #1</td>
<td>9.43</td>
<td>36.80%</td>
<td>0.250</td>
<td>0.21</td>
<td>82.00</td>
<td>0.0203</td>
<td>0.49</td>
<td>0.09</td>
<td>75%</td>
</tr>
<tr>
<td><strong>Total FB-1</strong></td>
<td>9.43</td>
<td>40.00%</td>
<td>1.250</td>
<td>0.42</td>
<td>59.50</td>
<td>0.0921</td>
<td>2.21</td>
<td>0.40</td>
<td>75%</td>
</tr>
<tr>
<td>FB-2 Resin Non-Spray Layup</td>
<td>9.43</td>
<td>36.80%</td>
<td>13.900</td>
<td>0.11</td>
<td>93.00</td>
<td>2.6699</td>
<td>68.88</td>
<td>12.57</td>
<td>100%</td>
</tr>
<tr>
<td>FB-2 Gel Coat #2</td>
<td>9.43</td>
<td>36.80%</td>
<td>0.700</td>
<td>0.50</td>
<td>82.00</td>
<td>0.1353</td>
<td>3.25</td>
<td>0.59</td>
<td>75%</td>
</tr>
<tr>
<td>FB-2 Gel Coat #3</td>
<td>9.43</td>
<td>47.00%</td>
<td>0.700</td>
<td>0.50</td>
<td>115.00</td>
<td>0.1898</td>
<td>4.55</td>
<td>0.83</td>
<td>75%</td>
</tr>
<tr>
<td><strong>Total FB-2</strong></td>
<td>9.43</td>
<td>40.00%</td>
<td>14.600</td>
<td>0.61</td>
<td>93.00</td>
<td>3.4611</td>
<td>83.07</td>
<td>15.16</td>
<td>75%</td>
</tr>
<tr>
<td>FB-3 Gel Coat #3</td>
<td>9.43</td>
<td>36.50%</td>
<td>0.700</td>
<td>0.50</td>
<td>82.00</td>
<td>0.1898</td>
<td>4.55</td>
<td>0.83</td>
<td>75%</td>
</tr>
<tr>
<td><strong>Total FB-3</strong></td>
<td>9.43</td>
<td>40.00%</td>
<td>14.600</td>
<td>0.61</td>
<td>93.00</td>
<td>3.4611</td>
<td>83.07</td>
<td>15.16</td>
<td>75%</td>
</tr>
</tbody>
</table>

Total VOC/HAPs and PM from Resin and Gel Use (tons/yr) | 16.99 | 14.53 |

* Single HAP (tons/yr) | 16.99 | Styrene |

Note:
Assume all of the monomer are styrene.
* Most of Styrene emissions are trapped in the process of making fiberglass. Therefore the VOC emissions from styrene are considered HAPs emissions also
* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.
For all other fiberglass operations, use the AP-42 emission factors and the calculation spreadsheet

**Catalyst**

<table>
<thead>
<tr>
<th>Emission Unit ID</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Monomer</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum usage (unit/hour)</th>
<th>UEF (lbs styrene/ton material)</th>
<th>Potential VOC (lb/hr)</th>
<th>Potential PM (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Catalyst</strong></td>
<td>9.05</td>
<td>98.5%</td>
<td>0.313</td>
<td>0.67</td>
<td>-</td>
<td>1.8694</td>
<td>44.87</td>
</tr>
</tbody>
</table>

**HAP**

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum usage (unit/hour)</th>
<th>Weight % Xylene</th>
<th>Weight % Dime. Pthal.</th>
<th>Weight % Benzene</th>
<th>Weight % Styrene</th>
<th>PTE Xylene (ton/yr)</th>
<th>PTE Dimethyl Pthalate (ton/yr)</th>
<th>PTE Benzene (ton/yr)</th>
<th>Styrene (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Catalyst</td>
<td>9.05</td>
<td>0.3130</td>
<td>0.67</td>
<td>0.00%</td>
<td>32.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00</td>
<td>2.66</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

Total HAPs (tons/yr) | 2.66 | Dimethyl Pthalate

Potential PM (ton/year) = Density * (1 - Weight % monomer or VOC) * Gal of Material * Maximum Usage * (1 - transfer efficiency) * 24 hrs/day * 365 days/year * (1 ton/2000 lbs)
Potential VOC (ton/yr) = Potential VOC (lb/day) * Potential VOC (lb/hr) * Potential VOC (lb/ton material) * Potential VOC (ton/yr)
Potential PM (ton/yr) = Potential PM (lb/day) * Potential PM (lb/hr) * Potential PM (lb/ton material) * Potential PM (ton/yr)

The emission factors are based on the "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (April 1999) to calculate
Potential VOC (lb/hr) for resins or gels = Density (lb material/gal material) * Gal. of material (gal material/unit) * Maximum usage (unit/hr) * UEF (lb styrene/ton material)
Potential PM (ton/year) = Density * (1 - Weight % monomer or VOC) * Gal. of Material * Maximum Usage * (1 - transfer efficiency) * 24 hrs/day * 365 days/year * (1 ton/2000 lbs)

Note:
Assume all of the monomer are styrene.
* Most of Styrene emissions are trapped in the process of making fiberglass. Therefore the VOC emissions from styrene are considered HAPs emissions also
* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.
For all other fiberglass operations, use the AP-42 emission factors and the calculation spreadsheet

**METHODOLOGY**

The emission factors are based on the "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (April 1999) to calculate
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Potential PM (ton/year) = Density * (1 - Weight % monomer or VOC) * Gal. of Material * Maximum Usage * (1 - transfer efficiency) * 24 hrs/day * 365 days/year * (1 ton/2000 lbs)
Potential VOC (ton/yr) = Potential VOC (lb/day) * Potential VOC (lb/hr) * Potential VOC (lb/ton material) * Potential VOC (ton/yr)
### Appendix A: Emissions Calculations

**Particulate Emissions**

**Panel Saw**

**Company Name:** Polar King International, Inc.  
**Address:** 4424 New Haven Ave, Fort Wayne, IN 46803  
**Minor Source Modification:** T003-41956-00232  
**Minor Permit Modification:** T003-41994-00232  
**Reviewer:** Mena Mekhail

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Design Outlet Grain Loading (grains/scf)</th>
<th>Flowrate (scfm)</th>
<th>Control Efficiency (%)</th>
<th>PM/PM10/PM2.5 (lb/hr)</th>
<th>PM/PM10/PM2.5 (ton/yr)</th>
<th>PM/PM10/PM2.5 (lb/hr)</th>
<th>PM/PM10/PM2.5 (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM/PM-10</td>
<td>0.030</td>
<td>1,100</td>
<td>95.00%</td>
<td>0.28</td>
<td>1.24</td>
<td>5.66</td>
<td>24.78</td>
</tr>
</tbody>
</table>

**METHODOLOGY**

Controlled Emissions (lb/hr) = Design Outlet Grain Loading (grains/acfm) * Flowrate (acfm/min) * 60 (min/hr) * 1/7,000 (grains/lb)

Controlled Emissions (tpy) = Design Outlet Grain Loading (grains/acfm) * Flowrate (acfm/min) * 60 (min/hr) * 1/7,000 (grains/lb) * 8,760 (hr/yr) / 2000 (lb/ton)

Uncontrolled Emissions (lb/hr) = Controlled Emissions (lb/hr) / (1 - Control Efficiency %)

Uncontrolled Emissions (tpy) = Controlled Emissions (lb/hr) / (1 - Control Efficiency %) * 8,760 (hr/yr) / 2,000 (lb/ton)
# Appendix A: Emissions Calculations
## Natural Gas Combustion Only

**MM BTU/HR <100**

<table>
<thead>
<tr>
<th>Company Name:</th>
<th>Polar King International, Inc.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address:</td>
<td>4424 New Haven Ave, Fort Wayne, IN 46803</td>
</tr>
<tr>
<td>Minor Source Modification:</td>
<td>T003-41956-00232</td>
</tr>
<tr>
<td>Minor Permit Modification:</td>
<td>T003-41994-00232</td>
</tr>
<tr>
<td>Reviewer:</td>
<td>Mena Mekhail</td>
</tr>
</tbody>
</table>

### Heat Input Capacity

<table>
<thead>
<tr>
<th>Heat Input Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>MMBtu/hr</td>
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<tr>
<td>0.1</td>
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</table>

### HHV

<table>
<thead>
<tr>
<th>HHV</th>
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</thead>
<tbody>
<tr>
<td>mmBtu</td>
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<tr>
<td>1020</td>
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</table>

### Potential Throughput

<table>
<thead>
<tr>
<th>Potential Throughput</th>
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</thead>
<tbody>
<tr>
<td>MMCF/yr</td>
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<tr>
<td>0.9</td>
</tr>
</tbody>
</table>

### Pollutant Emissions

<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></td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td></td>
<td></td>
<td>100</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>5.5</td>
<td>84</td>
<td></td>
</tr>
</tbody>
</table>

**Potential Emission in tons/yr**

<table>
<thead>
<tr>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.00</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

### Methodology

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

### Hazardous Air Pollutants (HAPs)

#### HAPs - Organics

<table>
<thead>
<tr>
<th>HAPs - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
</tr>
<tr>
<td>Emission Factor in lb/MMCF</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
</tr>
</tbody>
</table>

#### HAPs - Metals

<table>
<thead>
<tr>
<th>HAPs - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead</td>
</tr>
<tr>
<td>Emission Factor in lb/MMcf</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
</tr>
</tbody>
</table>

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.
## Appendix A: Emissions Calculations

### Miscellaneous Woodworking Equipment

**Company Name:** Polar King International, Inc.  
**Address:** 4424 New Haven Ave, Fort Wayne, IN 46803  
**Minor Source Modification:** T003-41956-00232  
**Minor Permit Modification:** T003-41994-00232  
**Reviewer:** Mena Mekhail

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Maximum Throughput (lbs/hr)</th>
<th>Uncontrolled Emission Factor (lb/ton)</th>
<th>Potential Uncontrolled Emissions (lb/hr)</th>
<th>Potential Uncontrolled Emissions (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>8.84</td>
<td>0.35</td>
<td>0.0015</td>
<td>0.0068</td>
</tr>
<tr>
<td>PM10/PM2.5</td>
<td>0.20</td>
<td>0.0009</td>
<td>0.0009</td>
<td>0.0039</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td>0.01</td>
<td>0.0039</td>
</tr>
</tbody>
</table>

**Methodology**

The emission factors used in the above table are from AP-42, 4th Edition, September 1985, Table 10.3-1. verified

Maximum Throughput (lbs/hr) provided by the source.

Potential Uncontrolled PM/PM10/PM2.5 (lb/hr) = Throughput (lbs/hr) * Emission Factor (lb/ton)

Potential Uncontrolled PM/PM10/PM2.5 (tons/year) = Potential Uncontrolled PM/PM10/PM2.5 (lb/hr) * 8760 hr/year * 1 ton/2000 lbs
### Appendix A: Emissions Calculations

**Welding/Cutting Equipment**

Company Name: Polar King International, Inc.  
Address: 4424 New Haven Ave, Fort Wayne, IN 46803  
Minor Source Modification: T003-41956-00232  
Minor Permit Modification: T003-41994-00232  
Reviewer: Mena Mekhail

<table>
<thead>
<tr>
<th>Process</th>
<th>PM Emissions Factor</th>
<th>Emissions Factor Units</th>
<th>Reference</th>
<th>Throughput</th>
<th>Throughput Units</th>
<th>PM PM10/PM2.5 Emissions (tpy)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Welding</td>
<td>81.6</td>
<td>lb/10³ lbs of electrode</td>
<td>AP-42, Chpt 12.19 Table 12.19-1</td>
<td>500</td>
<td>lbs of electrode/yr</td>
<td>0.020</td>
</tr>
<tr>
<td>Handheld trimming/cutting</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>total (tpy) 0.040</td>
</tr>
</tbody>
</table>

Emissions are calculated assuming 8760 hours of operation per year.
### Appendix A: Emissions Calculations

#### Wire Foam Cutting Saw

- **Company Name:** Polar King International, Inc.
- **Address:** 4424 New Haven Ave, Fort Wayne, IN 46803
- **Minor Source Modification:** T003-41956-00232
- **Minor Permit Modification:** T003-41994-00232
- **Reviewer:** Mena Mekhail

| Emission Unit | Process | Rate (buns/hr) | Cuts per bun long side | Cuts per bun short side | Wire Width (in) | Bun Length (in) | Bun Width (in) | Bun Height (in) | Density (lbs/ft³) | Volume removed per long side cut (ft³) | Volume removed per short side cut (ft³) | Mass of material removed per long side cut (lbs) | Mass of material removed per short side cut (lbs) | Volume removed per bun (ft³) | Mass of material removed per bun (lbs) | Process weight rate (lbs/hr) | 326 IAC 6-3-2 Limit (lbs/hr) | Uncontrolled PM PTE emissions (lb/hr) | Uncontrolled PM PTE emissions (tpy) | Uncontrolled PM10 PTE (tpy) | Uncontrolled PM2.5 PTE (tpy) | Capture Efficiencies | Capture & Control Efficiencies | Controlled PM PTE emissions (lb/hr) | Controlled PM10 PTE (tpy) | Controlled PM2.5 PTE (tpy) | Controlled PM PTE emissions (tpy) | Controlled PM2.5 PTE emissions (tpy) |
|---------------|---------|----------------|-------------------------|-------------------------|----------------|----------------|----------------|----------------|----------------|--------------------------------------|----------------------------------------|----------------------------------------------------------------|----------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|--------------------------------------|
| Wire Cutter   | 0.375   | 6              | 2                       | 0.0625                  | 192            | 51             | 27             | 2.30           | 0.35           | 0.1875                              | 0.81                                   | 0.43                                                          | 5.75                                                   | 132.00                              | 0.66                                                          | 2.16                                              | 9.45                                                  | 0.94                                                     | 99.56%                                              | 70.00%                                              | 69.69%                                              | 2.863                                              | 0.2863                                              | 0.2863                                              | 0.2863                                              | 0.2863                                              |

**Esco DPW 36 HP horizontal CNC wire saw**

The facility can cut at most 3 buns per shift for a total of 9 buns per day based upon lack of storage space and the time to process the buns to make more space. Worst case buns are 16 feet long and would be cut into 5 pieces with 4 edges removed. Short edges are calculated as the weight times the length. Long edges are calculated as the length times the width. Density was determined by weighing and measuring a 16 foot long bun.

PM, PM10, and PM2.5 ratios were developed utilizing "Evaluation of Particles Generated During Trimming and Cutting of Spray Polyurethane Foam Insulation". Polyurethane Technical Conference. American Chemistry Council 2010. Based upon the findings of the study the vast majority of the inhalable particles (PM >100 microns) were not inhalable (PM 10 and PM 2.5), as "their use resulted primarily in relatively large particles of foam which fell to the floor as they were generated". Although the test results suggest much lower numbers, we conservatively estimate only 10% of PM is PM10 and PM2.5.
December 30, 2019

Mr. Marc Baily
Polar King International, Inc.
4410 New Haven Avenue
Fort Wayne, Indiana 46803

Re: Public Notice
Polar King International, Inc.
Permit Level: Title V Minor Permit Modification
Permit Number: 003-41994-00232

Dear Baily:

Enclosed is a copy of your draft Title V Minor Permit Modification, 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 Allen County Library (Main Library), 900 Library Plaza in Fort Wayne, Indiana. 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 Mr. Mena Mekhail, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-7434 or dial (317) 234-7434.

Sincerely,

John F. Jackson

John F. Jackson
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 4/12/19
December 30, 2019

To: Allen County Library (Main Branch)

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: Polar King International, Inc.
Permit Number: 003-41994-00232

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

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

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

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

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

Enclosures
PN Library updated 4/2019
Notice of Public Comment

December 30, 2019
Polar King International, Inc.
003-41994-00232

Dear Concerned Citizen(s):

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

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

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

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

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

Enclosure
PN AAA Cover Letter 4/12/2019
Notice of Public Comment

December 30, 2019
Polar King International, Inc.
003-41994-00232

Dear Concerned Citizen(s):

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

## IDEM Staff
**JJACKSON** 12/30/2019
Polar King International Inc 003-41994-00232 (DRAFT)

<table>
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<th>Name and address of Sender</th>
<th>Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204</th>
<th>Type of Mail: CERTIFICATE OF MAILING ONLY</th>
<th>AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING</th>
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</thead>
</table>

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<th>Line</th>
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<th>Act. Value (If Registered)</th>
<th>Insured Value</th>
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<th>S.D. Fee</th>
<th>S.H. Fee</th>
<th>Rest. Del. Fee</th>
<th>Remarks</th>
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<tbody>
<tr>
<td>1</td>
<td></td>
<td>Marc Bailey, Polar King International Inc 4410 New Haven Ave Fort Wayne IN 46803 (Source CAATS)</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>2</td>
<td></td>
<td>David Schenkel, President, Polar King International Inc 4410 New Haven Ave Fort Wayne IN 46803 (RO CAATS)</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>3</td>
<td></td>
<td>Daniel &amp; Sandy Trimmer, 15021 Yellow River Road Columbia City IN 46725 (Affected Party)</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
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<td></td>
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<tr>
<td>4</td>
<td></td>
<td>Duane &amp; Deborah Clark, Clark Farms 6973 E. 500 S. Columbia City IN 46725 (Affected Party)</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td></td>
<td>Allen County Public Library (Main Branch) 900 Library Plaza, P.O. Box 2270 Fort Wayne IN 46802 (Library)</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>6</td>
<td></td>
<td>Fort Wayne City Council and Mayors Office 200 E Berry Street Ste 120 Fort Wayne IN 46802 (Local Official)</td>
<td></td>
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<tr>
<td>7</td>
<td></td>
<td>Mr. Jeff Coburn, Plumbers &amp; Steamfitters, Local 165 2930 W Ludwig Rd Fort Wayne IN 46818-1328 (Affected Party)</td>
<td></td>
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<td>Roanoke Town Council P.O. Box 328 Roanoke IN 46783 (Local Official)</td>
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<td>Allen Co. Board of Commissioners 200 E Berry Street Ste 410 Fort Wayne IN 46802 (Local Official)</td>
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<td>Fort Wayne-Alien County Health Department 200 E Berry St Suite 300 Fort Wayne IN 46802 (Health Department)</td>
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<td>Ms. Andrea Swanson-Loop, Cornerstone Environmental 880 Lennox Ct Zionsville IN 46077 (Consultant)</td>
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<td>Lisa Green, The Journal Gazette 600 W Main St Fort Wayne IN 46802 (Affected Party)</td>
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Total number of pieces Listed by Sender
Total number of Pieces Received at Post Office
Postmaster, Per (Name of Receiving employee)

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