INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Revision to a
Federally Enforceable State Operating Permit (FESOP)

for New NGC, Inc. d/b/a National Gypsum Company in Vermillion County

Significant Permit Revision No.: 165-43005-00081

The Indiana Department of Environmental Management (IDEM) has received an application from New NGC, Inc. d/b/a National Gypsum Company, located at 75 Ivy Lane, Clinton, Indiana 47842, for a significant revision of its FESOP issued on July 10, 2019. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow New NGC, Inc. d/b/a National Gypsum Company to make certain changes at its existing source. New NGC, Inc. d/b/a National Gypsum Company has applied to construct new receiver/day bin systems for powdered minerals, change in the method of operation of existing silos and a surface coating process, and change to descriptive information about units that do not include changes in potential to emit or method of operation.

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). The potential to emit regulated air pollutants will continue to be limited to less than the Title V and PSD major threshold levels. 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 have been sent to:

Clinton Public Library
313 South 4th Street
Clinton, IN 47642

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

A copy of the application and preliminary findings is also available via IDEM's Virtual File Cabinet (VFC). To access 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 SPR 165-43005-00081 in all correspondence.

Comments should be sent to:

Doug Logan
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Doug Logan or (317) 234-5328
Or dial directly: (317) 234-5328
Fax: (317) 232-6749 attn: Doug Logan
E-mail: dlogan@idem.IN.gov

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

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

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above and will also be sent to 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 Doug Logan of my staff at the above address.

Brian Williams

Brian Williams, Section Chief
Permits Branch
Office of Air Quality

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Eric J. Holcomb
Governor

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Bruno L. Pigott
Commissioner

Mr. George Schmalz
New NGC, Inc. d/b/a National Gypsum Company
75 Ivy Lane
Clinton, Indiana 47842

Re: 165-43005-00081
Significant Revision to
F164-40533-00081

Dear Mr. Schmalz:

New NGC, Inc. d/b/a National Gypsum Company was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F165-40533-00081, on July 10, 2019, for a stationary concrete backer board plant located at 75 Ivy Lane, Clinton, Indiana 47842. On June 29, 2020, the Office of Air Quality (OAQ) received an application from the source requesting construction approval of new receiver/day bin systems for powdered minerals, changes in the method of operation of existing silos and a surface coating process, and changes to descriptive information about units that do not include changes in potential to emit or method of operation. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, the following emission units are approved for construction at the source:

- One (1) aluminate receiver/day bin system, identified as U15, approved in 2020 for construction, with a maximum capacity of 540 lbs/hr, consisting of:

  (A) One (1) receiver, identified as Aluminate Receiver, using baghouse CE12 as control, exhausting indoors.

  (B) One (1) day bin, identified as Aluminate Day Bin, with a hard-piped vent to Silo U2 controlled by cartridge filter CE2, and exhausting to stack S2.

- One (1) hydrated lime receiver/day bin system, identified as U16, approved in 2020 for construction, with a maximum capacity of 200 lbs/hr, consisting of:

  (A) One (1) receiver, identified as Hydrated Lime Receiver, using baghouse CE16 as control, exhausting indoors.

  (B) One (1) day bin, identified as Hydrated Lime Day Bin, with a hard-piped vent to Silo U3 controlled by cartridge filter CE3, and exhausting to stack S3.

The following construction conditions are applicable to the proposed project:

<u>General Construction Conditions</u>

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to <u>any</u> proposed change in construction which may affect

the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

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

Effective Date of the Permit

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

Commenced Construction

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the Significant Permit Revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised.

A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. A copy of the application and permit is also available via IDEM's Virtual File Cabinet (VFC). To access 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. 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.

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 Doug Logan, 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) 234-5328 or (800) 451-6027, and ask for Doug Logan or (317) 234-5328.

Sincerely,

Brian Williams, Section Chief
Permits Branch
Office of Air Quality

Attachments: Revised permit and Technical Support Document.

cc: File - Vermillion County
Vermillion County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch

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Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY

New NGC, Inc. d/b/a National Gypsum Company
75 Ivy Lane
Clinton, Indiana 47842

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

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

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

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

Operation Permit No.: F165-40533-00081 Master Agency Interest ID.: 14315	
Issued by: Original signed by: Brian Williams, Section Chief Permits Branch, Office of Air Quality	Issuance Date: July 10, 2019 Expiration Date: July 10, 2029

Significant Permit Revision No.: 165-43005-00081	
Issued by: Brian Willams, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: July 10, 2029

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary concrete backer board plant.

Source Address:	75 Ivy Lane, Clinton, Indiana 47842
General Source Phone Number:	(765) 828-0898
SIC Code:	3272 (Concrete Products, Except Block and Brick)
County Location:	Vermillion
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) Raw Material Silos:

(1) Fly ash storage silos, constructed in 2005, modified in 2019, with a combined maximum throughput capacity of 9,200 lbs/hr, as follows:

(A) One (1) fly ash storage silo, identified as U1, using cartridge filter CE1 for particulate control, and exhausting to stack S1.

(B) One (1) fly ash storage silo, identified as U2, using cartridge filter CE2 for particulate control, and exhausting to stack S2.

(2) One (1) Portland cement storage silo, identified as U3, constructed in 2005, modified in 2006 and 2019, with a maximum throughput capacity of 6,000 lbs/hr, using cartridge filter CE3 for particulate control, , and exhausting to stack S3.

(3) One (1) hydrated lime storage silo, identified as U4, constructed in 2005, modified in 2019, approved in 2020 for modification, with a maximum throughput capacity of 200 lbs/hr, using cartridge filter CE4 for particulate control, and exhausting to stack S4.

(4) One (1) aluminate storage silo, identified as U5, constructed in 2005, modified in 2019, approved in 2020 for modification, with a maximum throughput capacity of 540 lbs/hr, using cartridge filter CE5 for particulate control, and exhausting to stack S5.

(5) One (1) cementitious blending powders storage silo, identified as U6, constructed in 2005, approved in 2020 for modification, with a maximum throughput capacity of 1,760 lbs/hr, using cartridge filter CE6 for particulate control, and exhausting to stack S6.

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(b) Raw Material Storage Bins:

(1) One (1) fly ash receiver/day bin system, identified as U7, constructed in 2005, modified in 2019, with a maximum throughput capacity of 9,200 lbs/hr, consisting of:

(A) One (1) receiver, identified as Fly Ash Receiver, using baghouse CE7 for particulate control, exhausting indoors.

(B) One (1) day bin, identified as Fly Ash Day Bin, with a hard-piped vent to Silo U2 controlled by cartridge filter CE2, and exhausting to stack S2.

(2) One (1) Portland cement receiver/day bin system, identified as U8, constructed in 2005, modified in 2019, with a maximum throughput capacity of 6,000 lbs/hr, consisting of:

(A) One (1) receiver, identified as Portland Cement Receiver, using baghouse CE8 for particulate control, exhausting indoors.

(B) One (1) day bin, identified as Portland Cement Day Bin, with a hard-piped vent to Silo U3 controlled by cartridge filter CE3, and exhausting to stack S3.

(3) One (1) cementitious blending powder receiver/day bin system, identified as U9, constructed in 2005, modified in 2019, with a maximum capacity of 1,760 lbs/hr, consisting of:

(A) One (1) receiver, identified as Cementitious Blending Powder Receiver, using baghouse CE9 for particulate control, exhausting indoors.

(B) One (1) day bin, identified as Cementitious Blending Powder Day Bin, with a hard-piped vent to Silo U2 controlled by cartridge filter CE2, and exhausting to stack S2.

(4) One (1) aluminate receiver/day bin system, identified as U15, approved in 2020 for construction, with a maximum capacity of 540 lbs/hr, consisting of:

(A) One (1) receiver, identified as Aluminate Receiver, using baghouse CE12 as control, exhausting indoors.

(B) One (1) day bin, identified as Aluminate Day Bin, with a hard-piped vent to Silo U2 controlled by cartridge filter CE2, and exhausting to stack S2.

(5) One (1) hydrated lime receiver/day bin system, identified as U16, approved in 2020 for construction, with a maximum capacity of 200 lbs/hr, consisting of:

(A) One (1) receiver, identified as Hydrated Lime Receiver, using baghouse CE13 as control, exhausting indoors.

(B) One (1) day bin, identified as Hydrated Lime Day Bin, with a hard-piped vent to Silo U3 controlled by cartridge filter CE3, and exhausting to stack S3.

(c) One (1) Wet End Operations Unit, identified as U10, constructed in 2005, consisting of

conveying raw material and mixing it with water to form a slurry to spread and dry into the sheet, with a maximum capacity of 21,000 lbs of board per hour, equipped with a baghouse for particulate control identified as CE10, located inside the sand storage room and exhausting through an outside vent, identified as S12.

(d) One Board Sawing Unit, identified as U11, constructed in 2005 with a maximum capacity of 52 square foot of board sawn per hour, equipped with cartridge filters for particulate control identified as CE11, exhausting to stack identified as S10.

(e) One (1) Polystyrene Expansion, Aging, and Drying System operating in batch mode, identified as U12, constructed in 2005, modified in 2016, with a maximum capacity of 2,205 lbs of polystyrene beads per batch and a batch time of 5 hours, exhausting to stack identified as S11 with no control.

(f) One (1) Ink Application System, identified as U14, constructed in 2017, approved in 2020 for modification, with a maximum capacity of 0.25 gal/hr of ink, using an automated spray head, uncontrolled, and exhausting indoors.

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

This stationary source also includes the following insignificant activities:

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

(1) One (1) natural gas-fired boiler, identified as Boiler #1, constructed in 2005, rated at 3.188 MMBtu/hr.

(2) Eleven (11) natural gas-fired space heaters, identified as Large Space Heaters, combined capacity of 5.3 MMBtu/hr.

(3) Five (5) natural gas-fired space heaters, identified as Small Space Heaters, with combined capacity of 0.5 MMBtu/hr.

(4) One (1) natural gas-fired water heater, identified as Water Heater, with maximum capacity of 0.2 MMBtu/hr.

(b) Paved and unpaved roads.

(c) An emission unit or activity whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(e)(1) or the exemption levels specified in the following, whichever is lower:

- For lead or lead compounds measured as elemental lead, the exemption level is six-tenths (0.6) ton per year or three and twenty-nine hundredths (3.29) pounds per day.
- For carbon monoxide (CO), the exemption limit is twenty-five (25) pounds per day.
- For sulfur dioxide, the exemption level is five (5) pounds per hour or twenty-five (25) pounds per day.
- For VOC, the exemption limit is three (3) pounds per hour or fifteen (15) pounds per day.
- For nitrogen oxides (NOx), the exemption limit is five (5) pounds per hour or twenty-five (25) pounds per day.
- For PM10 or direct PM2.5, the exemption level is either five (5) pounds per hour or twenty-five (25) pounds per day.

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As follows:

(1) One (1) Indoor Sand Storage and Handling System with high moisture content, identified as U13, constructed in 2005 with a maximum capacity of 14,860 lbs/hr with no control and exhausting inside.

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

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

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SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, F165-40533-00081, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

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

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

B.5 Severability [326 IAC 2-8-4(4)]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

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

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B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

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

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

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ 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.

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) All terms and conditions of permits established prior to F165-40533-00081 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

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

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

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

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

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

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B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

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B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

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SECTION C **SOURCE OPERATION CONDITIONS**

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

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

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

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

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

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

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C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

C.7 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(c).

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an

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alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

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

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

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

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

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The 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.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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

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(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.17 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.

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Raw Material Silos:

(1) Fly ash storage silos, constructed in 2005, modified in 2019, with a combined maximum throughput capacity of 9,200 lbs/hr, as follows:

(A) One (1) fly ash storage silo, identified as U1, using cartridge filter CE1 for particulate control, and exhausting to stack S1.

(B) One (1) fly ash storage silo, identified as U2, using cartridge filter CE2 for particulate control, and exhausting to stack S2.

(2) One (1) Portland cement storage silo, identified as U3, constructed in 2005, modified in 2006 and 2019, with a maximum throughput capacity of 6,000 lbs/hr, using cartridge filter CE3 for particulate control, , and exhausting to stack S3.

(3) One (1) hydrated lime storage silo, identified as U4, constructed in 2005, modified in 2019, approved in 2020 for modification, with a maximum throughput capacity of 200 lbs/hr, using cartridge filter CE4 for particulate control, and exhausting to stack S4.

(4) One (1) aluminate storage silo, identified as U5, constructed in 2005, modified in 2019, approved in 2020 for modification, with a maximum throughput capacity of 540 lbs/hr, using cartridge filter CE5 for particulate control, and exhausting to stack S5.

(5) One (1) cementitious blending powders storage silo, identified as U6, constructed in 2005, approved in 2020 for modification, with a maximum throughput capacity of 1,760 lbs/hr, using cartridge filter CE6 for particulate control, and exhausting to stack S6.

(b) Raw Material Storage Bins:

(1) One (1) fly ash receiver/daybin system, identified as U7, constructed in 2005, modified in 2019, with a maximum throughput capacity of 9,200 lbs/hr, consisting of:

(A) One (1) receiver, identified as Fly Ash Receiver, using baghouse CE7 for particulate control, exhausting indoors.

(B) One (1) day bin, identified as Fly Ash Day Bin, with a hard-piped vent to Silo U2 controlled by cartridge filter CE2, and exhausting to stack S2.

(2) One (1) Portland cement receiver/day bin system, identified as U8, constructed in 2005, modified in 2019, with a maximum throughput capacity of 6,000 lbs/hr, consisting of:

(A) One (1) receiver, identified as Portland Cement Receiver, using baghouse CE8 for particulate control, exhausting indoors.

(B) One (1) day bin, identified as Portland Cement Day Bin, with a hard-piped vent to Silo U3 controlled by cartridge filter CE3, and exhausting to stack S3.

(3) One (1) cementitious blending powder receiver/day bin system, identified as U9,

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constructed in 2005, modified in 2019, with a maximum capacity of 1,760 lbs/hr, consisting of:

(A) One (1) receiver, identified as Cementitious Blending Powder Receiver, using baghouse CE9 for particulate control, exhausting indoors.

(B) One (1) day bin, identified as Cementitious Blending Powder Day Bin, with a hard-piped vent to Silo U2 controlled by cartridge filter CE2, and exhausting to stack S2.

(4) One (1) aluminate receiver/day bin system, identified as U15, approved in 2020 for construction, with a maximum capacity of 540 lbs/hr, consisting of:

(A) One (1) receiver, identified as Aluminate Receiver, using baghouse CE12 as control, exhausting indoors.

(B) One (1) day bin, identified as Aluminate Day Bin, with a hard-piped vent to Silo U2 controlled by cartridge filter CE2, and exhausting to stack S2.

(5) One (1) hydrated lime receiver/day bin system, identified as U16, approved in 2020 for construction, with a maximum capacity of 200 lbs/hr, consisting of:

(A) One (1) receiver, identified as Hydrated Lime Receiver, using baghouse CE16 as control, exhausting indoors.

(B) One (1) day bin, identified as Hydrated Lime Day Bin, with a hard-piped vent to Silo U3 controlled by cartridge filter CE3, and exhausting to stack S3.

(c) One (1) Wet End Operations Unit, identified as U10, constructed in 2005, consisting of conveying raw material and mixing it with water to form a slurry to spread and dry into the sheet, with a maximum capacity of 21,000 lbs of board per hour, equipped with a baghouse for particulate control identified as CE10, located inside the sand storage room and exhausting through an outside vent, identified as S12.

(d) One Board Sawing Unit, identified as U11, constructed in 2005 with a maximum capacity of 52 square foot of board sawn per hour, equipped with cartridge filters for particulate control identified as CE11, exhausting to stack identified as S10.

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

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

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emissions rate from the following operations shall not exceed the pound per hour limit (E) when operating at the associated process weight rate as listed in the table below:

Process / Emission Unit	P (ton/hr)	E (lb/hr)
Fly Ash Storage Silo (U1)	4.60	11.40
Fly Ash Storage Silo (U2)	4.60	11.40
Portland Cement Storage Silo (U3)	3.00	8.56
Hydrated Lime Storage Silo (U4)	0.10	0.88
Aluminate Storage Silo (U5)	0.27	1.71

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Process / Emission Unit	P (ton/hr)	E (lb/hr)
Cementitious Blending Powders Storage Silo (U6)	0.88	3.76
Fly Ash Receiver/Day Bin System (U7)	4.60	11.40
Portland Cement Receiver/Day Bin System (U8)	3.00	8.56
Cementitious Blending Powder Receiver/Day Bin System (U9)	0.88	3.76
Wet End Operations Unit (U10)	10.50	19.81
Board Sawing Unit (U11)	10.50	19.81
Aluminate Receiver/Day Bin System (U15)	0.27	1.71
Hydrated Lime Receiver/Day Bin System (U16)	0.10	0.88

D.1.2 PSD Minor PM Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the limits in the table below for the units listed:

Unit ID	PM Limit (lbs/hr)
Fly Ash Storage Silo (U1)	0.47
Fly Ash Storage Silo (U2)	0.47
Portland Cement Storage Silo (U3)	0.47
Hydrated Lime Storage Silo (U4)	0.47
Aluminate Storage Silo (U5)	0.47
Cementitious Blending Powders Storage Silo (U6)	0.47
Fly Ash Receiver/Day Bin System (U7)	0.47
Portland Cement Receiver/Day Bin System (U8)	0.47
Cementitious Blending Powder Receiver/Day Bin System (U9)	0.47
Wet End Operations Unit (U10)	0.57
Board Sawing Unit (U11)	0.43

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

D.1.3 FESOP and PSD Minor PM_{10}/$PM_{2.5}$ Limits [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 and in order to render the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the limits in the table below for the units listed:

Unit ID	PM_{10} Limit (lbs/hr)	$PM_{2.5}$ Limit (lbs/hr)
Fly Ash Storage Silo (U1)	0.47	0.47
Fly Ash Storage Silo (U2)	0.47	0.47
Portland Cement Storage Silo (U3)	0.47	0.47
Hydrated Lime Storage Silo (U4)	0.47	0.47
Aluminate Storage Silo (U5)	0.47	0.47
Cementitious Blending Powders Storage Silo (U6)	0.47	0.47
Fly Ash Receiver/Day Bin System (U7)	0.47	0.47
Portland Cement Receiver/Day Bin System (U8)	0.47	0.47
Cementitious Blending Powder Receiver/Day Bin System (U9)	0.47	0.47
Wet End Operations Unit (U10)	0.57	0.57

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Unit ID	PM_{10} Limit (lbs/hr)	$PM_{2.5}$ Limit (lbs/hr)
Board Sawing Unit (U11)	0.43	0.43

Compliance with these limits, combined with the potential to emit PM_{10} and $PM_{2.5}$ from all other emission units at this source, shall limit the source-wide total potential to emit of PM_{10} and $PM_{2.5}$ to less than one hundred (100) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.

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

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

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

D.1.5 Particulate Control

In order to assure compliance with Conditions D.1.1, D.1.2, and D.1.3, the devices listed in the table below for particulate matter control shall be in operation and control emissions from the corresponding facilities at all times the facilities are in operation.

Process / Emission Unit	Control Device	Device ID
Fly Ash Storage Silo (U1)	Cartridge filter	CE1
Fly Ash Storage Silo (U2)	Cartridge filter	CE2
Portland Cement Storage Silo (U3)	Cartridge filter	CE3
Hydrated Lime Storage Silo (U4)	Cartridge filter	CE4
Aluminate Storage Silo (U5)	Cartridge filter	CE5
Cementitious Blending Powders Storage Silo (U6)	Cartridge filter	CE6
Fly Ash Receiver/Day Bin System (U7)	Baghouse	CE7
Portland Cement Receiver/Day Bin System (U8)	Baghouse	CE8
Cementitious Blending Powder Receiver/Day Bin System (U9)	Baghouse	CE9
Wet End Operations Unit (U10)	Baghouse	CE10
Board Sawing Unit (U11)	Cartridge filter	CE11
Aluminate Receiver/Day Bin System (U15)	Baghouse	CE12
Hydrated Lime Receiver/Day Bin System (U16)	Baghouse	CE13

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

D.1.6 Visible Emission Notations

(a) Visible emission notations of the stack exhaust from the stacks listed in the table below shall be performed once per day during normal daylight operations of the processes listed when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

Process / Emission Unit	Control Device ID	Stack ID
Fly Ash Storage Silo (U1)	CE1	S1
Fly Ash Storage Silo (U2)	CE2	S2
Portland Cement Storage Silo (U3)	CE3	S3
Hydrated Lime Storage Silo (U4)	CE4	S4
Aluminate Storage Silo (U5)	CE5	S5

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Process / Emission Unit	Control Device ID	Stack ID
Cementitious Blending Powders Storage Silo (U6)	CE6	S6
Wet End Operations Unit (U10)	CE10	S12
Board Sawing Unit (U11)	CE11	S10

(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) 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.

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

D.1.7 Broken or Failed Cartridge Detection

In the event that cartridge failure has been observed:

(a) For single compartment baghouses/cartridge filters 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 even qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses/cartridge filters 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 emissions unit. Operations may continue only if the even qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.1.8 Baghouse/Cyclone Inspections

The Permittee shall perform semi-annual inspections of the bahouses listed in the table below controlling particulate from the facilities identified in the table to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

Process / Emission Unit	Device ID
Fly Ash Receiver/Day Bin System (U7)	CE7
Portland Cement Receiver/Day Bin System (U8)	CE8
Cementitious Blending Powder Receiver/Day Bin System (U9)	CE9
Aluminate Receiver/Day Bin System (U15)	CE12
Hydrated Lime Receiver/Day Bin System (U16)	CE13

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

D.1.9 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of the stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(b) To document the compliance status with Condition D.1.8, the Permittee shall maintain records of the dates and results of the inspections.

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

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SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

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

(1) One (1) natural gas-fired boiler, identified as Boiler #1, constructed in 2005, rated at 3.188 MMBtu/hr.

...

(4) One (1) natural gas-fired water heater, identified as Water Heater, with maximum capacity of 0.2 MMBtu/hr.

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

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

D.2.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from the 3.188 MMBtu per hour heat input boiler and the 0.2 MMBtu per hour heat input water heater shall be limited to 0.6 pounds per million Btu heat input, each.

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SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(e) One (1) Polystyrene Expansion, Aging, and Drying System operating in batch mode, identified as U12, constructed in 2005, modified in 2016, with a maximum capacity of 2,205 lbs of polystyrene beads per batch and a batch time of 5 hours, exhausting to stack identified as S11 with no control.

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

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

D.3.1 VOC [326 IAC 8-1-6] [326 IAC 2-8-4]

Pursuant to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), Significant Permit Revision No. 165-35908-00081, and 326 IAC 2-8-4, and in order to render the requirements of 326 IAC 2-7 (Part 70) not applicable, the Permittee shall control VOC emissions from the polystyrene expansion, aging, and drying system (U12) using Best Available Control Technology (BACT), which has been determined to be the following:

(a) VOC content of polystyrene beads shall not exceed 7.5% by weight.

(b) The total throughput of polystyrene beads shall not exceed 700 tons per twelve (12) month consecutive period.

Compliance with the above shall satisfy the requirements of 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) for the polystyrene expansion, again, and drying system (U12).

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

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

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

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC usage limitations contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the Certificate of Analyses VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.3.4 Record Keeping Requirement

(a) To document the compliance status with Conditions D.3.1(b) and D.3.3, the Permittee shall maintain the following records:

(1) The VOC content of the Polystyrene beads used. Records shall include the Certificate of Analyses VOC data sheets from the Polystyrene bead manufacturer for each shipment of the beads along with documentation of each shipment (e.g. purchase order).

(2) Total throughput of polystyrene beads each month and each compliance period.

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

D.3.5 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as difined by 326 IAC 2-1.1-1(1).

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SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(f) One (1) Ink Application System, identified as U14, constructed in 2017, approved in 2020 for modification, with a maximum capacity of 0.25 gal/hr of ink, using an automated spray head, uncontrolled, 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 2-8-4(1)]

D.4.1 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (d), particulate from the paint/ink operation, U14, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device. The Permittee shall use the following work practices as equivalent control for the paint/ink operation:

Operator Training

(a) The Permittee shall train all new and existing personnel, including contract personnel, who are involved in the paint application system 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 subsection (B) are maintained, all personnel shall be given refresher training annually.

(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.

(3) Appropriate equipment setup and adjustments to minimize material usage and overspray.

(c) The owner or operator 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.

(B) The date the person was trained or date of most recent refresher training, whichever is later.

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

D.4.2 Record Keeping Requirement

(a) To document the compliance status with Condition D.4.1, the Permittee shall maintain:

(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.

(B) The date the person was trained or date of most recent refresher training, whichever is later.

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

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: New NGC, Inc. d/b/a National Gypsum Company
Source Address: 75 Ivy Lane, Clinton, Indiana 47842
FESOP Permit No.: F165-40533-00081

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

Please check what document is being certified:

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

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

Signature:
Printed Name:
Title/Position:
Date:

DRAFT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: New NGC, Inc. d/b/a National Gypsum Company
Source Address: 75 Ivy Lane, Clinton, Indiana 47842
FESOP Permit No.: F165-40533-00081

This form consists of 2 pages **Page 1 of 2**

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

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

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

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If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FESOP Quarterly Report

Source Name: New NGC, Inc. d/b/a National Gypsum Company
Source Address: 75 Ivy Lane, Clinton, Indiana 47842
FESOP Permit No.: F165-40533-00081
Facility: One (1) Polystyrene Expansion, Aging, and Drying System (U12)
Parameter: Total polystyrene bead throughput
Limit: The total throughput of polystyrene beads shall not exceed 700 tons per twelve (12) month consecutive period.

QUARTER : _____YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this quarter.

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

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

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

Source Name: New NGC, Inc. d/b/a National Gypsum Company
Source Address: 75 Ivy Lane, Clinton, Indiana 47842
FESOP Permit No.: F165-40533-00081

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

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	**New NGC, Inc. d/b/a National Gypsum Company**
Source Location:	**75 Ivy Lane, Clinton, Indiana 47842**
County:	**Vermillion**
SIC Code:	**3272 (Concrete Products, Except Block and Brick)**
Operation Permit No.:	**F 165-40533-00081**
Operation Permit Issuance Date:	**July 10, 2019**
Significant Permit Revision No.:	**165-43005-00081**
Permit Reviewer:	**Doug Logan**

Existing Approvals

The source was issued FESOP Renewal No. 165-40533-00081 on July 10, 2019. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Vermillion County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.[1]
$PM_{2.5}$	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour $PM_{2.5}$ standard.
PM_{10}	Attainment effective October 27, 1997, for the part of Clinton Township that includes sections 15, 16, 21, 22, 27, 28, 33, and 34. Unclassifiable effective November 15, 1990, for the remainder of Vermillion County.
NO_2	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO_2 standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.
[1]Unclassifiable 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 (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to ozone. Vermillion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$
Vermillion County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

Fugitive Emissions

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

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_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 revision, after consideration of all enforceable limits established in the effective permits. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Source-Wide Emissions Prior to Revision (ton/year)							
	PM[1]	**PM_{10}[1]**	**$PM_{2.5}$[1, 2]**	**SO_2**	**NO_X**	**VOC**	**CO**	**Combined HAPs**
Total PTE of Entire Source Excluding Fugitive Emissions*	24.02	24.25	24.25	0.02	3.94	63.94	3.31	0.07
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	--

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

[2]$PM_{2.5}$ listed is direct $PM_{2.5}$.

*Fugitive HAP emissions are always included in the source-wide emissions.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(c) These emissions are based on the TSD of FESOP Renewal No. 165-40533-00081, issued on July 10, 2019.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by New NGC, Inc. d/b/a National Gypsum Company on June 29, 2020, relating to construction of new receiver/day bin systems for powdered minerals, changes in the method of operation of existing silos and a surface coating process, and changes to descriptive information about units that do not include changes in potential to emit or method of operation.

The following is a list of the new emission units and pollution control devices:

- One (1) aluminate receiver/day bin system, identified as U15, approved in 2020 for construction, with a maximum capacity of 540 lbs/hr, consisting of:

  (A) One (1) receiver, identified as Aluminate Receiver, using baghouse CE12 as control, exhausting indoors.

  (B) One (1) day bin, identified as Aluminate Day Bin, with a hard-piped vent to Silo U2 controlled by cartridge filter CE2, and exhausting to stack S2.

- One (1) hydrated lime receiver/day bin system, identified as U16, approved in 2020 for construction, with a maximum capacity of 200 lbs/hr, consisting of:

  (A) One (1) receiver, identified as Hydrated Lime Receiver, using baghouse CE16 as control, exhausting indoors.

  (B) One (1) day bin, identified as Hydrated Lime Day Bin, with a hard-piped vent to Silo U3 controlled by cartridge filter CE3, and exhausting to stack S3.

The following is a list of the modified emission unit and pollution control device:

- One (1) hydrated lime storage silo, identified as U4, constructed in 2005, modified in 2019, approved in 2020 for modification, with a maximum throughput capacity of 200 lbs/hr, using cartridge filter CE4 for particulate control, and exhausting to stack S4.

- One (1) aluminate storage silo, identified as U5, constructed in 2005, modified in 2019, approved in 2020 for modification, with a maximum throughput capacity of 540 lbs/hr, using cartridge filter CE5 for particulate control, and exhausting to stack S5.

- One (1) cementitious blending powders storage silo, identified as U6, constructed in 2005, approved in 2020 for modification, with a maximum throughput capacity of 1,760 lbs/hr, using cartridge filter CE6 for particulate control, and exhausting to stack S6.

- One (1) Ink Application System, identified as U14, constructed in 2017, approved in 2020 for modification, with a maximum capacity of 0.25 gal/hr of ink, using an automated spray head, uncontrolled, and exhausting indoors.

NOTE: Changes to descriptions of silo contents and material throughputs are not considered modifications that require revision of the permit. Potential to emit determined from outlet grain loading and air flow rates does not change and the FESOP and PSD limits applicable to the units are not changing.

The following emission unit is being removed from the permit:

- One (1) Indoor Sand Storage and Handling System with high moisture content, identified as U13, constructed in 2005 with a maximum capacity of 14,860 lbs/hr with no control and exhausting inside.

The following insignificant activity is added to the permit:

- An emission unit or activity whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(e)(1) or the exemption levels specified in the following, whichever is lower:

  - For lead or lead compounds measured as elemental lead, the exemption level is six-tenths (0.6) ton per year or three and twenty-nine hundredths (3.29) pounds per day.
  - For carbon monoxide (CO), the exemption limit is twenty-five (25) pounds per day.
  - For sulfur dioxide, the exemption level is five (5) pounds per hour or twenty-five (25) pounds per day.
  - For VOC, the exemption limit is three (3) pounds per hour or fifteen (15) pounds per day.
  - For nitrogen oxides (NOx), the exemption limit is five (5) pounds per hour or twenty-five (25) pounds per day.
  - For PM10 or direct PM2.5, the exemption level is either five (5) pounds per hour or twenty-five (25) pounds per day.

  As follows:

  (1) One (1) Indoor Sand Storage and Handling System with high moisture content, identified as U13, constructed in 2005 with a maximum capacity of 14,860 lbs/hr with no control and exhausting inside.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

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

Permit Level Determination – FESOP Significant Permit Revision

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 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. 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.

	PTE Before Controls of the New Emission Units (ton/year)							
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$[1]**	**SO_2**	**NO_X**	**VOC**	**CO**	**Combined HAPs**
Aluminate receiver and day bin, U15	15.99	15.99	15.99	-	-	-	-	-
Hydrated lime receiver and day bin, U16	15.99	15.99	15.99	-	-	-	-	-
Total PTE Before Controls of the New Emission Units:	**31.99**	**31.99**	**31.99**					
[1]$PM_{2.5}$ listed is direct $PM_{2.5}$.								

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

	PTE Increase of the Modified Emission Unit(s)/Process(es) (ton/year)							
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$[1]**	**SO_2**	**NO_X**	**VOC**	**CO**	**Combined HAPs**
PTE Before Modification (U4)	206.26	206.26	206.26	-	-	-	-	-
PTE After Modification (U4)	206.26	206.26	206.26	-	-	-	-	-
PTE Increase (U4)	*0*	*0*	*0*	-	-	-	-	-
PTE Before Modification (U5)	206.26	206.26	206.26	-	-	-	-	-
PTE After Modification (U5)	206.26	206.26	206.26	-	-	-	-	-
PTE Increase (U5)	*0*	*0*	*0*	-	-	-	-	-
PTE Before Modification (U6)	206.26	206.26	206.26	-	-	-	-	-
PTE After Modification (U6)	206.26	206.26	206.26	-	-	-	-	-
PTE Increase (U6)	*0*	*0*	*0*	-	-	-	-	-
PTE Before Modification (U13)	0.07	0.07	0.07	-	-	-	-	-
PTE After Modification (U13)	0.21	0.10	0.10	-	-	-	-	-
PTE Increase (U13)	*0.14*	*0.03*	*0.03*	-	-	-	-	-
PTE Before Modification (U14)	0.92	0.92	0.92	-	-	11.22	-	-
PTE After Modification (U14)	0	0	0	-	-	7.52	-	-
PTE Increase (U14)	*0*	*0*	*0*	-	-	-	-	-
Total PTE Increase of the Modified Emission Unit(s)/Process	**0.14**	**0.03**	**0.03**	**-**	**-**	**0**	**-**	**-**
[1]$PM_{2.5}$ listed is direct $PM_{2.5}$.								

NOTE: Upon review, IDEM, OAQ finds that PSD minor limitations on the sand storage and handling operation (U13) were not enforceable as a practical matter. The unit is also found to be exempt from 326 IAC 6-3. A conservative uncontrolled potential to emit for this process is being added to the source-wide potential to emit after issuance which shows clearly that the PTE remains below PSD and Part 70 thresholds.

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

	PTE Increases Due to the Revision (ton/year)							
	PM	**PM_{10}**	**$PM_{2.5}$[1]**	**SO_2**	**NO_X**	**VOC**	**CO**	**Total HAPs**
Total PTE Before Controls of the New Emission Units	31.99	31.99	31.99	-	-	-	-	-
Total PTE Increase of the Modified Emission Unit(s)/Process	0.14	0.03	0.03	-	-	0	-	-
Total PTE of the Revision	**32.12**	**32.01**	**32.01**	**-**	**-**	**0**	**-**	**-**
[1]$PM_{2.5}$ listed is direct $PM_{2.5}$.								

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

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves the construction of new emission units with potential to emit equal to or greater than twenty-five (25) tons per year of the following pollutants:
(i) PM, PM_{10}, or direct $PM_{2.5}$.

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Source-Wide Emissions After Issuance (ton/year)							
	PM[1]	**PM_{10}[1]**	**$PM_{2.5}$[1, 2]**	**SO_2**	**NO_X**	**VOC**	**CO**	**Combined HAPs**
Total PTE of Entire Source Excluding Fugitives*	55.19	55.30	55.30	2.36E-02	3.94	60.24	3.31	7.43E-02
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	--
[1]Under the Part 70 Permit program (40 CFR 70), PM_{10} and $PM_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant." [2]$PM_{2.5}$ listed is direct $PM_{2.5}$. *Fugitive HAP emissions are always included in the source-wide emissions.								

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

(a) This existing Title V minor stationary source will continue to be minor under 326 IAC 2-7 because the potential to emit criteria pollutants and HAPs from the entire source will continue to be less than or limited to less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-8 (FESOP) and is an area source under Section 112 of the Clean Air Act (CAA).

(b) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the potential to emit of all PSD regulated pollutants from the entire source will continue to be less than or limited to less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

Due to the proposed revision, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

(a) The requirements of the Standards of Performance for Portland Cement Plants, 40 CFR 60, Subpart F and 326 IAC 12, are still not included in the permit for the modified Portland cement storage silo (U3) and Portland Cement receiver/day bin system (U8), because the source is not a facility that manufactures Portland cement by either the wet or dry process

(b) The requirements of the Standards of Performance for Nonmetallic Mineral Processing Plants, 40 CFR 60, Subpart OOO and 326 IAC 12, are not included in the permit for any of the new or modified storage silos (U1 – U6) or receiver/day bin systems (U7 – U9, U15, U16), because, pursuant to 40 CFR 60.670(a)(2), the source does not include crushers or grinding mills.

(c) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) From the Portland Cement Manufacturing Industry, 40 CFR 63, Subpart LLL and 326 IAC 20-27 are still not included in the permit for the modified Portland cement storage silo (U3) and Portland Cement receiver/day bin system (U8), since the source is not a major source of HAP emissions and is not a Portland cement plant as defined at 40 CFR 63.1341. The source does not manufacture Portland cement.

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Lime Manufacturing Plants, 40 CFR 63, Subpart AAAAA and 326 IAC 20-91 are not included in the permit for the hydrated lime storage silo and the hydrated lime receiver/day bin system, since the source is not a lime manufacturing plant as defined at 40 CFR 63.7143 and the source is not a major source of HAP emissions. The source is not a plant which uses a lime kiln to produce lime product from limestone or other calcareous material by calcination.

(c) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included for this proposed revision.

Compliance Assurance Monitoring (CAM):

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

State Rule Applicability - Entire Source

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

326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)
PSD and Emission Offset applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.

PSD Minor Source PM Limit(s)

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the limits in the table below for the units listed:

Unit ID	PM Limit (lbs/hr)
Fly Ash Storage Silo (U1)	0.47
Fly Ash Storage Silo (U2)	0.47
Portland Cement Storage Silo (U3)	0.47
Hydrated Lime Storage Silo (U4)	0.47
Aluminate Storage Silo (U5)	0.47
Cementitious Blending Powders Storage Silo (U6)	0.47
Fly Ash Receiver/Day Bin System (U7)	0.47
Portland Cement Receiver/Day Bin System (U8)	0.47
Cementitious Blending Powder Receiver/Day Bin System (U9)	0.47
Wet End Operations Unit (U10)	0.57
Board Sawing Unit (U11)	0.43

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

NOTE: As noted in the Description of Proposed Revision section above, FESOP and PSD minor limits applicable to these units are not changing.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The new emission unit(s) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply. statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.

FESOP PM_{10} and $PM_{2.5}$ Limit(s)

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the limits in the table below for the units listed:

Unit ID	PM_{10} Limit (lbs/hr)	$PM_{2.5}$ Limit (lbs/hr)
Fly Ash Storage Silo (U1)	0.47	0.47
Fly Ash Storage Silo (U2)	0.47	0.47
Portland Cement Storage Silo (U3)	0.47	0.47
Hydrated Lime Storage Silo (U4)	0.47	0.47
Aluminate Storage Silo (U5)	0.47	0.47

Unit ID	PM_{10} Limit (lbs/hr)	$PM_{2.5}$ Limit (lbs/hr)
Cementitious Blending Powders Storage Silo (U6)	0.47	0.47
Fly Ash Receiver/Day Bin System (U7)	0.47	0.47
Portland Cement Receiver/Day Bin System (U8)	0.47	0.47
Cementitious Blending Powder Receiver/Day Bin System (U9)	0.47	0.47
Wet End Operations Unit (U10)	0.57	0.57
Board Sawing Unit (U11)	0.43	0.43

Compliance with these limits, combined with the potential to emit PM_{10} and $PM_{2.5}$ from all other emission units at this source, shall limit the source-wide total potential to emit of PM_{10} and $PM_{2.5}$ to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable. requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

NOTE: As noted in the Description of Proposed Revision section above, FESOP and PSD minor limits applicable to these units are not changing.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-1(a), this source (located in Vermillion County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

State Rule Applicability – Individual Facilities

Due to the proposed revision, state rule applicability has been reviewed as follows:

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
(a) Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the the units listed in the table below, since these are manufacturing processes not exempted from this rule under 326 IAC 6-3-1(b) and that are 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).

The following units are subject to 326 IAC 6-3-2 (e). The table below outlines the limits the source must comply with.

Process Description	Process Weight Rate (ton/hr)	326 IAC 6-3-2 Limit (lb/hr)	Uncontrolled PM Emissions (lb/hr)
Fly Ash Storage Silo (U1)	4.60	11.40	47.09
Fly Ash Storage Silo (U2)	4.60	11.40	47.09
Portland Cement Storage Silo (U3)	3.00	8.56	47.09
Hydrated Lime Storage Silo (U4)	0.10	0.88	47.09
Aluminate Storage Silo (U5)	0.27	1.71	47.09
Cementitious Blending Powders Storage Silo (U6)	0.88	3.76	47.09
Fly Ash Receiver/Day Bin System (U7)	4.60	11.40	14.74
Portland Cement Receiver/ Day Bin System (U8)	3.00	8.56	14.74
Cementitious Blending Powder Receiver/Day Bin System (U9)	0.88	3.76	14.74
Aluminate Receiver/Day Bin System(U15)	0.27	1.71	3.65

Process Description	Process Weight Rate (ton/hr)	326 IAC 6-3-2 Limit (lb/hr)	Uncontrolled PM Emissions (lb/hr)
Hydrated Lime Receiver/Day Bin System (U16)	0.10	0.88	3.65

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

(b) Pursuant to 326 IAC 6-3-1(b)(14), the indoor sand storage and handling system (U13) is not subject to the requirements of 326 IAC 6-3, since the potential emissions of the process are less than 0.551 lb/hr.

Compliance Determination and Monitoring Requirements

(a) The Compliance Determination Requirements applicable to this revision are as follows:

(1) The devices listed in the table below for particulate matter control shall be in operation and control emissions from the corresponding facilities at all times the facilities are in operation.

Process / Emission Unit	Control Device	Device ID
Fly Ash Storage Silo (U1)	Cartridge filter	CE1
Fly Ash Storage Silo (U2)	Cartridge filter	CE2
Portland Cement Storage Silo (U3)	Cartridge filter	CE3
Hydrated Lime Storage Silo (U4)	Cartridge filter	CE4
Aluminate Storage Silo (U5)	Cartridge filter	CE5
Cementitious Blending Powders Storage Silo (U6)	Cartridge filter	CE6
Fly Ash Receiver/Day Bin System (U7)	Baghouse	CE7
Portland Cement Receiver/Day Bin System (U8)	Baghouse	CE8
Cementitious Blending Powder Receiver/Day Bin System (U9)	Baghouse	CE9
Wet End Operations Unit (U10)	Baghouse	CE10
Board Sawing Unit (U11)	Cartridge filter	CE11
Aluminate Receiver/Day Bin System (U15)	Baghouse	CE12
Hydrated Lime Receiver/Day Bin System (U16)	Baghouse	CE13

(b) The Compliance Monitoring Requirements applicable to this proposed revision are as follows:

Control Device	Type of Parametric Monitoring	Frequency	Range or Specification
Cartridge filter CE1 (Unit U1)	Visible emission notations	Daily	Verify whether emissions are normal or abnormal
Cartridge filter CE2 (Unit U2)			
Cartridge filter CE3 (Unit U3)			
Cartridge filter CE4 (Unit U4)			

Control Device	Type of Parametric Monitoring	Frequency	Range or Specification
Cartridge filter CE5 (Unit U5)			
Cartridge filter CE6 (Unit U6)			
Cartridge filter CE10 (Unit U10)			
Cartridge filter CE11 (Unit U11)			
Baghouse CE7 (Unit U7)	Baghouse inspections	Semi-annual	Verify that it is operated and maintained per manufacturer's specifications
Baghouse CE8 (Unit U8)			
Baghouse CE9 (Unit U9)			
Baghouse CE12 (Unit U15)			
Baghouse CE13 (Unit U16)			

These monitoring conditions are necessary because the cartridge filters and baghouses for the the listed units must operate properly to assure compliance with 326 IAC 2-2 (PSD), 326 IAC 2-8 (FESOP), and 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes).

Proposed Changes

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

(1) IDEM, OAQ made the following changes to storage silo descriptions in paragraph A.2(a) and the Section D.1 emissions unit description box:
- Modification history was incorporated.
- Updated information about material throughput was incorporated.
- Modification of U4 to contain hydrated lime is incorporated.
- Modification of U5 to contain aluminate is incorporated.
- Modification of U6 to contain cementitious blending powders is incorporated.

(2) IDEM, OAQ made the following changes to storage silo descriptions in paragraph A.2(b) and the Section D.1 emissions unit description box:
- Descriptions are revised to describe the combination of product receiver and day bin.
- Updated information about material throughput was incorporated.
- The new hydrated lime receiver and day bin system is incorporated.
- The new aluminate receiver and day bin system is incorporated.

(3) IDEM, OAQ incorporated the modification history of the polystyrene expansion, aging, and drying system into paragraph A.2(e) and the Section D.3 emissions unit description box.

(4) IDEM, OAQ deleted paragraph A.2(f) and paragraph (f) in the Secition D.1 emissions unit description box because the sand storage and handling operation is determined to be an insignificant activity. Subsequent paragraphs were re-lettered.

(5) IDEM, OAQ incorporated the modification of the ink application system system into paragraph A.2(f) and the Section D.4 emissions unit description box.

(6) IDEM, OAQ added a new paragraph A.3(c) because the sand storage and handling operation is determined to be an insignificant activity with the potential to emit less than five (5) pounds per hour or twenty-five (25) pounds per day of PM_{10} of $PM_{2.5}$.

(7) IDEM, OAQ made the following changes to Condition D.1.1 - Particulate:
- The condition was revised to current model language.
- Revised unit descriptions were incorporated.
- Limits were revised based on new information about throughputs provided by the source.
- The sand storage and handling operation is deleted because the process is exempt from 326 IAC 6-3. *(see paragraph (b) in the 326 IAC 6-3-2 paragraph of the State Rule Applicability – Individual Facilities section, above)*
- Limits for the new hydrated lime receiver and day bin system and aluminate receiver and day bin system are added.

(8) IDEM, OAQ made the following changes to Condition D.1.2 – PSD Minor PM Limits:
- The condition was revised to current model language.
- Revised unit descriptions were incorporated.
- Control device information that was not relevant to the limit was deleted.
- The sand storage and handling process was deleted because the limit was not enforceable as a practical matter. The uncontrolled potential to emit of the process is now included in the potential to emit after issuance.
- A total that was not relevant to the limit was deleted.

(9) IDEM, OAQ made the following changes to Condition D.1.3 – PSD Minor PM_{10} and $PM_{2.5}$ Limits:
- The condition was revised to current model language.
- Revised unit descriptions were incorporated.
- Control device information that was not relevant to the limit was deleted.
- The sand storage and handling process was deleted because the limits were not enforceable as a practical matter. The uncontrolled potential to emit of the process is now included in the potential to emit after issuance.
- Totals that were not relevant to the limits were deleted.

(10) IDEM, OAQ added a table of units and control devices to Condition D.1.5 – Particulate Control.

(11) IDEM, OAQ added a table of units and control devices to clarify the requirements in Condition D.1.6 – Visible Emission Notations.

(12) IDEM, OAQ added a new Condition D.1.8 – Baghouse Inspections to incorporate required compliance monitoring provisions for units that discharge indoors. The subsequent condition was renumbered.

(13) IDEM, OAQ made the following changes to Condition D.1.9 – Record Keeping Requirements:
- Paragraph (a) was updated to current model language.
- A new paragraph (b) is added to incorporate record keeping requirements for the new compliance monitoring condition. The subsequest paragraph was relettered.

Additional Changes

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

(1) Effective June 8, 2019, the requirements of 326 IAC 14-10 (Emission Standards for Asbestos Demolition and Renovation Operations) were amended. Based on the amended rule, Section C.7 - Asbestos Abatement Projects of the permit has been revised.

The entire permit has been revised as follows

SECTION A SOURCE SUMMARY

…

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

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

(a) Raw Material Silos:

~~(1) Two (2) Fly Ash Storage Silos, identified as U1 and U2, constructed in 2005, with a combined maximum capacity of 11,400 lbs/hr, each equipped with one (1) of two (2) cartridge filters for particulate control, identified as CE1 and CE2, and each exhausting to stacks, identified as S1 and S2, respectively.~~

~~(2) Two (2) Portland Cement Storage Silos, identified as U3 and U4, constructed in 2005, with a combined maximum capacity of 9,800 lbs/hr, equipped with two (2) cartridge filters for particulate control, identified as CE3 and CE4, and exhausting to stacks, identified as S3 and S4, respectively.~~

~~(3) One (1) Cementitious Blending Powder Storage Silo, identified as U5, constructed in 2005, with a maximum capacity of 1,760 lbs/hr, equipped with one (1) cartridge filter for particulate control, identified as CE5, exhausting to a stack, identified as S5.~~

~~(4) One (1) Aluminate Storage Silo, identified as U6, constructed in 2005, with a maximum capacity of 1,320 lbs/hr, equipped with one (1) cartridge filter for particulate control, identified as CE6, exhausting to a stack, identified as S6.~~

(1) Fly ash storage silos, constructed in 2005, modified in 2019, with a combined maximum throughput capacity of 9,200 lbs/hr, as follows:

(A) One (1) fly ash storage silo, identified as U1, using cartridge filter CE1 for particulate control, and exhausting to stack S1.

(B) One (1) fly ash storage silo, identified as U2, using cartridge filter CE2 for particulate control, and exhausting to stack S2.

(2) One (1) Portland cement storage silo, identified as U3, constructed in 2005, modified in 2006 and 2019, with a maximum throughput capacity of 6,000 lbs/hr, using cartridge filter CE3 for particulate control, , and exhausting to stack S3.

(3) One (1) hydrated lime storage silo, identified as U4, constructed in 2005, modified in 2019, approved in 2020 for modification, with a maximum throughput capacity of 200 lbs/hr, using cartridge filter CE4 for particulate control, and exhausting to stack S4.

(4) One (1) aluminate storage silo, identified as U5, constructed in 2005, modified in 2019, approved in 2020 for modification, with a maximum throughput capacity of 540 lbs/hr, using cartridge filter CE5 for particulate control, and exhausting to stack S5.

(5) One (1) cementitious blending powders storage silo, identified as U6,

constructed in 2005, approved in 2020 for modification, with a maximum throughput capacity of 1,760 lbs/hr, using cartridge filter CE6 for particulate control, and exhausting to stack S6.

(b) Raw Material Storage Bins:

~~(1) One (1) Fly Ash Bin, identified as U7, constructed in 2005, with a maximum capacity of 11,400 lbs/hr, equipped with a baghouse for particulate control, identified as CE7, exhausting within the building, coupled with one (1) Day Bin with hard piping venting back to Silo U2.~~

~~(2) One (1) Portland Cement Bin, identified as U8, constructed in 2005, with a maximum capacity of 9,800 lbs/hr, equipped with a baghouse for particulate control, identified as CE8, exhausting within the building, coupled with one (1) Day Bin with hard piping venting back to Silo U3.~~

~~(3) One (1) Cementitious Blending Powder Bin, identified as U9, constructed in 2005, with a maximum capacity of 1,760 lbs/hr, equipped with a baghouse for particulate control identified as CE9, exhausting within the building, coupled with one (1) Day Bin with hard piping venting back to Silo U5.~~

(1) One (1) fly ash receiver/day bin system, identified as U7, constructed in 2005, modified in 2019, with a maximum throughput capacity of 9,200 lbs/hr, consisting of:

(A) One (1) receiver, identified as Fly Ash Receiver, using baghouse CE7 for particulate control, exhausting indoors.

(B) One (1) day bin, identified as Fly Ash Day Bin, with a hard-piped vent to Silo U2 controlled by cartridge filter CE2, and exhausting to stack S2.

(2) One (1) Portland cement receiver/day bin system, identified as U8, constructed in 2005, modified in 2019, with a maximum throughput capacity of 6,000 lbs/hr, consisting of:

(A) One (1) receiver, identified as Portland Cement Receiver, using baghouse CE8 for particulate control, exhausting indoors.

(B) One (1) day bin, identified as Portland Cement Day Bin, with a hard-piped vent to Silo U3 controlled by cartridge filter CE3, and exhausting to stack S3.

(3) One (1) cementitious blending powder receiver/day bin system, identified as U9, constructed in 2005, modified in 2019, with a maximum capacity of 1,760 lbs/hr, consisting of:

(A) One (1) receiver, identified as Cementitious Blending Powder Receiver, using baghouse CE9 for particulate control, exhausting indoors.

(B) One (1) day bin, identified as Cementitious Blending Powder Day Bin, with a hard-piped vent to Silo U2 controlled by cartridge filter CE2, and exhausting to stack S2.

(4) One (1) aluminate receiver/day bin system, identified as U15, approved in 2020 for construction, with a maximum capacity of 540 lbs/hr, consisting of:

(A) One (1) receiver, identified as Aluminate Receiver, using baghouse CE12 as control, exhausting indoors.

(B) One (1) day bin, identified as Aluminate Day Bin, with a hard-piped vent to Silo U2 controlled by cartridge filter CE2, and exhausting to stack S2.

(5) One (1) hydrated lime receiver/day bin system, identified as U16, approved in 2020 for construction, with a maximum capacity of 200 lbs/hr, consisting of:

(A) One (1) receiver, identified as Hydrated Lime Receiver, using baghouse CE13 as control, exhausting indoors.

(B) One (1) day bin, identified as Hydrated Lime Day Bin, with a hard-piped vent to Silo U3 controlled by cartridge filter CE3, and exhausting to stack S3.

(c) ...

(e) One (1) Polystyrene Expansion, Aging, and Drying System operating in batch mode, identified as U12, constructed in 2005**, modified in 2016,** with a maximum capacity of 2,205 lbs of polystyrene beads per batch and a batch time of 5 hours, exhausting to stack identified as S11 with no control.

~~(f) One (1) Indoor Sand Storage and Handling System with high moisture content, identified as U13, constructed in 2005 with a maximum capacity of 14,860 lbs/hr with no control and exhausting inside.~~

(~~g~~**f**) One (1) ~~Paint/~~Ink Application System, identified as U14, constructed in 2017, **approved in 2020 for modification,** with a maximum capacity of ~~0.33 gal/hr of paint and 0.115~~ **0.25** gal/hr of ink, using ~~a low-pressure spray gun~~ **an automated spray head**, uncontrolled, and exhausting indoors.

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

This stationary source also includes the following insignificant activities:

(a) ...

(c) An emission unit or activity whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(e)(1) or the exemption levels specified in the following, whichever is lower:

- **For lead or lead compounds measured as elemental lead, the exemption level is six-tenths (0.6) ton per year or three and twenty-nine hundredths (3.29) pounds per day.**
- **For carbon monoxide (CO), the exemption limit is twenty-five (25) pounds per day.**
- **For sulfur dioxide, the exemption level is five (5) pounds per hour or twenty-five (25) pounds per day.**
- **For VOC, the exemption limit is three (3) pounds per hour or fifteen (15) pounds per day.**
- **For nitrogen oxides (NOx), the exemption limit is five (5) pounds per hour or twenty-five (25) pounds per day.**
- **For PM_{10} or direct $PM_{2.5}$, the exemption level is either five (5) pounds per hour or twenty-five (25) pounds per day.**

As follows:

(1) One (1) Indoor Sand Storage and Handling System with high moisture content, identified as U13, constructed in 2005 with a maximum capacity of 14,860 lbs/hr with no control and exhausting inside.

…

SECTION C SOURCE OPERATION CONDITIONS

…

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) …

(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~~**c**).

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

…

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Raw Material Silos:

~~(1) Two (2) Fly Ash Storage Silos, identified as U1 and U2, constructed in 2005, with a combined maximum capacity of 11,400 lbs/hr, each equipped with one (1) of two (2) cartridge filters for particulate control, identified as CE1 and CE2, and each exhausting to stacks, identified as S1 and S2, respectively.~~

~~(2) Two (2) Portland Cement Storage Silos, identified as U3 and U4, constructed in 2005, with a combined maximum capacity of 9,800 lbs/hr, equipped with two (2) cartridge filters for particulate control, identified as CE3 and CE4, and exhausting to stacks, identified as S3 and S4, respectively.~~

~~(3) One (1) Cementitious Blending Powder Storage Silo, identified as U5, constructed in 2005, with a maximum capacity of 1,760 lbs/hr, equipped with one (1) cartridge filter for particulate control, identified as CE5, exhausting to a stack, identified as S5.~~

~~(4) One (1) Aluminate Storage Silo, identified as U6, constructed in 2005, with a maximum capacity of 1,320 lbs/hr, equipped with one (1) cartridge filter for particulate control, identified as CE6, exhausting to a stack, identified as S6.~~

(1) Fly ash storage silos, constructed in 2005, modified in 2019, with a combined maximum throughput capacity of 9,200 lbs/hr, as follows:

(A) One (1) fly ash storage silo, identified as U1, using cartridge filter CE1 for particulate control, and exhausting to stack S1.

(B) One (1) fly ash storage silo, identified as U2, using cartridge filter CE2 for particulate control, and exhausting to stack S2.

(2) One (1) Portland cement storage silo, identified as U3, constructed in 2005, modified in 2006 and 2019, with a maximum throughput capacity of 6,000 lbs/hr,

using cartridge filter CE3 for particulate control, , and exhausting to stack S3.

(3) One (1) hydrated lime storage silo, identified as U4, constructed in 2005, modified in 2019, approved in 2020 for modification, with a maximum throughput capacity of 200 lbs/hr, using cartridge filter CE4 for particulate control, and exhausting to stack S4.

(4) One (1) aluminate storage silo, identified as U5, constructed in 2005, modified in 2019, approved in 2020 for modification, with a maximum throughput capacity of 540 lbs/hr, using cartridge filter CE5 for particulate control, and exhausting to stack S5.

(5) One (1) cementitious blending powders storage silo, identified as U6, constructed in 2005, approved in 2020 for modification, with a maximum throughput capacity of 1,760 lbs/hr, using cartridge filter CE6 for particulate control, and exhausting to stack S6.

(b) Raw Material Storage Bins:

~~(1) One (1) Fly Ash Bin, identified as U7, constructed in 2005, with a maximum capacity of 11,400 lbs/hr, equipped with a baghouse for particulate control, identified as CE7, exhausting within the building, coupled with one (1) Day Bin with hard piping venting back to Silo U2.~~

~~(2) One (1) Portland Cement Bin, identified as U8, constructed in 2005, with a maximum capacity of 9,800 lbs/hr, equipped with a baghouse for particulate control, identified as CE8, exhausting within the building, coupled with one (1) Day Bin with hard piping venting back to Silo U3.~~

~~(3) One (1) Cementitious Blending Powder Bin, identified as U9, constructed in 2005, with a maximum capacity of 1,760 lbs/hr, equipped with a baghouse for particulate control identified as CE9, exhausting within the building, coupled with one (1) Day Bin with hard piping venting back to Silo U5.~~

(1) One (1) fly ash receiver/day bin system, identified as U7, constructed in 2005, modified in 2019, with a maximum throughput capacity of 9,200 lbs/hr, consisting of:

(A) One (1) receiver, identified as Fly Ash Receiver, using baghouse CE7 for particulate control, exhausting indoors.

(B) One (1) day bin, identified as Fly Ash Day Bin, with a hard-piped vent to Silo U2 controlled by cartridge filter CE2, and exhausting to stack S2, and exhausting to stack S2.

(2) One (1) Portland cement receiver/day bin system, identified as U8, constructed in 2005, modified in 2019, with a maximum throughput capacity of 6,000 lbs/hr, consisting of:

(A) One (1) receiver, identified as Portland Cement Receiver, using baghouse CE8 for particulate control, exhausting indoors.

(B) One (1) day bin, identified as Portland Cement Day Bin, with a hard-piped vent to Silo U3 controlled by cartridge filter CE3, and exhausting to stack S3.

(3) One (1) cementitious blending powder receiver/day bin system, identified as U9, constructed in 2005, modified in 2019, with a maximum capacity of 1,760 lbs/hr,

consisting of:

(A) One (1) receiver, identified as Cementitious Blending Powder Receiver, using baghouse CE9 for particulate control, exhausting indoors.

(B) One (1) day bin, identified as Cementitious Blending Powder Day Bin, with a hard-piped vent to Silo U2 controlled by cartridge filter CE2, and exhausting to stack S2.

(4) One (1) aluminate receiver/day bin system, identified as U15, approved in 2020 for construction, with a maximum capacity of 540 lbs/hr, consisting of:

(A) One (1) receiver, identified as Aluminate Receiver, using baghouse CE12 as control, exhausting indoors.

(B) One (1) day bin, identified as Aluminate Day Bin, with a hard-piped vent to Silo U2 controlled by cartridge filter CE2, and exhausting to stack S2.

(5) One (1) hydrated lime receiver/day bin system, identified as U16, approved in 2020 for construction, with a maximum capacity of 200 lbs/hr, consisting of:

(A) One (1) receiver, identified as Hydrated Lime Receiver, using baghouse CE13 as control, exhausting indoors.

(B) One (1) day bin, identified as Hydrated Lime Day Bin, with a hard-piped vent to Silo U3 controlled by cartridge filter CE3, and exhausting to stack S3.

(c) ...

~~(f) One (1) Indoor Sand Storage and Handling System with high moisture content, identified as U13, constructed in 2005 with a maximum capacity of 14,860 lbs/hr with no control and exhausting inside.~~

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

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

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the ~~particulate emissions from the source shall not exceed the pound per hour emission rate established as E in the following formula~~ **allowable particulate emissions rate from the following operations shall not exceed the pound per hour limit (E) when operating at the associated process weight rate as listed in the table below**:

~~Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by the 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 emissions rate E has been established for the units as follows:~~

Process / Emission Unit	P (ton/hr)	E (lb/hr)
Fly Ash Storage Silo (U1)	~~2.85~~	~~8.27~~

Process / Emission Unit	P (ton/hr)	E (lb/hr)
	4.60	**11.40**
Fly Ash Storage Silo (U2)	~~2.85~~ **4.60**	~~8.27~~ **11.40**
Portland Cement Storage Silo (U3)	~~2.45~~ **3.00**	~~7.47~~ **8.56**
~~Portland Cement~~ **Hydrated Lime** Storage Silo (U4)	~~2.45~~ **0.10**	~~7.47~~ **0.88**
~~Cementitious Blending Powder~~ **Aluminate** Storage Silo (U5)	~~0.88~~ **0.27**	~~3.76~~ **1.71**
~~Aluminate~~ **Cementitious Blending Powders** Storage Silo (U6)	~~0.66~~ **0.88**	~~3.10~~ **3.76**
Fly Ash **Receiver/Day** Bin **System** (U7)	~~5.70~~ **4.60**	~~13.16~~ **11.40**
Portland Cement **Receiver/Day** Bin **System** (U8)	~~4.90~~ **3.00**	~~11.89~~ **8.56**
Cementitious Blending Powder **Receiver/Day** Bin **System** (U9)	0.88	3.76
Wet End Operations Unit (U10)	10.50	19.81
Board Sawing Unit (U11)	10.50	19.81
~~Indoor Sand Storage and Handling System (U13)~~	~~7.43~~	~~15.72~~
Aluminate Receiver/Day Bin System (U15)	**0.27**	**1.71**
Hydrated Lime Receiver/Day Bin System (U16)	**0.10**	**0.88**

D.1.2 PSD Minor PM ~~Minor~~ Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 **(Prevention of Significant Deterioration** (PSD)**)** not applicable, the ~~PM emissions shall not exceed the hourly rates expressed in the following table~~ **Permittee shall comply with the limits in the table below for the units listed**:

Unit ID	~~Hourly~~ PM Limit (lbs/hr)	~~Control ID~~
Fly Ash Storage Silo (U1)	0.47	~~Cartridge Filter (CE1)~~
Fly Ash Storage Silo (U2)	0.47	~~Cartridge Filter (CE2)~~
Portland Cement Storage Silo (U3)	0.47	~~Cartridge Filter (CE3)~~
~~Portland Cement~~ **Hydrated Lime** Storage Silo (U4)	0.47	~~Cartridge Filter (CE4)~~
~~Cementitious Blending Powder~~ **Aluminate** Storage Silo (U5)	0.47	~~Cartridge Filter (CE5)~~
~~Aluminate~~ **Cementitious Blending Powders** Storage Silo (U6)	0.47	~~Cartridge Filter (CE6)~~
Fly Ash **Receiver/Day** Bin **System** (U7)	0.47	~~Baghouse (CE7)~~
Portland Cement **Receiver/Day** Bin **System** (U8)	0.47	~~Baghouse (CE8)~~
Cementitious Blending Powder **Receiver/Day** Bin **System** (U9)	0.47	~~Baghouse (CE9)~~
Wet End Operations Unit (U10)	0.57	~~Baghouse (CE10)~~
Board Sawing Unit (U11)	0.43	~~Cartridge Filter (CE11)~~
~~Indoor Sand Storage and Handling System (U13)~~	~~0.02~~	~~(High Moisture)~~
~~Total~~	~~5.26~~	

Compliance with ~~above conditions~~ **these limits, combined with the potential to emit PM from all other emission units at this source,** shall limit the source-wide **total potential to emit of**

PM ~~emissions~~ to less than **two hundred fifty (**250**)** tons per twelve **(12)**consecutive month period**,** and shall render the requirements of 326 IAC 2-2 **(Prevention of Significant Deterioration** (PSD)**)** not applicable.

D.1.3 FESOP and PSD **Minor** PM_{10}/$PM_{2.5}$ ~~Minor~~ Limits [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 and in order to render the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) not applicable, the ~~PM10 and PM2.5 emissions shall not exceed the hourly rates expressed in the following table~~ **Permittee shall comply with the limits in the table below for the units listed**:

Unit ID	~~Hourly~~ PM_{10} Limit (lbs/hr)	~~Hourly~~ $PM_{2.5}$ Limit (lbs/hr)	~~Control ID~~
Fly Ash Storage Silo (U1)	0.47	0.47	~~Cartridge Filter (CE1)~~
Fly Ash Storage Silo (U2)	0.47	0.47	~~Cartridge Filter (CE2)~~
Portland Cement Storage Silo (U3)	0.47	0.47	~~Cartridge Filter (CE3)~~
~~Portland Cement~~ **Hydrated Lime** Storage Silo (U4)	0.47	0.47	~~Cartridge Filter (CE4)~~
~~Cementitious Blending Powder~~ **Aluminate** Storage Silo (U5)	0.47	0.47	~~Cartridge Filter (CE5)~~
~~Aluminate~~ **Cementitious Blending Powders** Storage Silo (U6)	0.47	0.47	~~Cartridge Filter (CE6)~~
Fly Ash **Receiver/Day** Bin **System** (U7)	0.47	0.47	~~Baghouse (CE7)~~
Portland Cement **Receiver/Day** Bin **System** (U8)	0.47	0.47	~~Baghouse (CE8)~~
Cementitious Blending Powder **Receiver/Day** Bin **System** (U9)	0.47	0.47	~~Baghouse (CE9)~~
Wet End Operations Unit (U10)	0.57	0.57	~~Baghouse (CE10)~~
Board Sawing Unit (U11)	0.43	0.43	~~Cartridge Filter (CE11)~~
~~Indoor Sand Storage and Handling System (U13)~~	~~0.02~~	~~0.02~~	~~(High Moisture)~~
~~Total~~	~~5.26~~	~~5.26~~	

Compliance with ~~above conditions~~ **these limits, combined with the potential to emit PM_{10} and $PM_{2.5}$ from all other emission units at this source,** shall limit the source-wide **total potential to emit of** PM10, and $PM_{2.5}$ ~~emissions~~ to less than **one hundred (**100**)** tons per twelve **(12)** consecutive month period, each**,** and shall render the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) not applicable.

…

D.1.5 Particulate Control

~~In order to comply with Conditions D.1.1, D.1.2, and D.1.3, particulate from the storage, conveying, and manufacturing processes shall be controlled by baghouses/cartridge filters at all times that the storage, conveying, and manufacturing processes are in operation.~~
In order to assure compliance with Conditions D.1.1, D.1.2, and D.1.3, the devices listed in the table below for particulate matter control shall be in operation and control emissions from the corresponding facilities at all times the facilities are in operation.

Process / Emission Unit	**Control Device**	**Device ID**
Fly Ash Storage Silo (U1)	**Cartridge filter**	**CE1**
Fly Ash Storage Silo (U2)	**Cartridge filter**	**CE2**

Process / Emission Unit	Control Device	Device ID
Portland Cement Storage Silo (U3)	**Cartridge filter**	**CE3**
Hydrated Lime Storage Silo (U4)	**Cartridge filter**	**CE4**
Aluminate Storage Silo (U5)	**Cartridge filter**	**CE5**
Cementitious Blending Powders Storage Silo (U6)	**Cartridge filter**	**CE6**
Fly Ash Receiver/Day Bin System (U7)	**Baghouse**	**CE7**
Portland Cement Receiver/Day Bin System (U8)	**Baghouse**	**CE8**
Cementitious Blending Powder Receiver/Day Bin System (U9)	**Baghouse**	**CE9**
Wet End Operations Unit (U10)	**Baghouse**	**CE10**
Board Sawing Unit (U11)	**Cartridge filter**	**CE11**
Aluminate Receiver/Day Bin System (U15)	**Baghouse**	**CE12**
Hydrated Lime Receiver/Day Bin System (U16)	**Baghouse**	**CE13**

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

D.1.6 Visible Emission Notations

(a) Visible emission notations of the stack exhaust from ~~Stacks S1 through S6, S10, and S12~~ **the stacks listed in the table below** shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

Process / Emission Unit	Control Device ID	Stack ID
Fly Ash Storage Silo (U1)	**CE1**	**S1**
Fly Ash Storage Silo (U2)	**CE2**	**S2**
Portland Cement Storage Silo (U3)	**CE3**	**S3**
Hydrated Lime Storage Silo (U4)	**CE4**	**S4**
Aluminate Storage Silo (U5)	**CE5**	**S5**
Cementitious Blending Powders Storage Silo (U6)	**CE6**	**S6**
Wet End Operations Unit (U10)	**CE10**	**S12**
Board Sawing Unit (U11)	**CE11**	**S10**

(b) ...

D.1.8 Baghouse Inspections

The Permittee shall perform semi-annual inspections of the bahouses listed in the table below controlling particulate from the facilities identified in the table to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

Process / Emission Unit	Device ID
Fly Ash Receiver/Day Bin System (U7)	**CE7**
Portland Cement Receiver/Day Bin System (U8)	**CE8**
Cementitious Blending Powder Receiver/Day Bin System (U9)	**CE9**
Aluminate Receiver/Day Bin System (U15)	**CE12**
Hydrated Lime Receiver/Day Bin System (U16)	**CE13**

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

D.1.~~8~~**9** Record Keeping Requirement**s**

(a) To document the compliance status with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the stack exhaust**s** ~~from Stack S1 through S6, S10, and S12 once per day~~. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(b) To document the compliance status with Condition D.1.8, the Permittee shall maintain records of the dates and results of the inspections.

(~~b~~**c**) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

…

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(e) One (1) Polystyrene Expansion, Aging, and Drying System operating in batch mode, identified as U12, constructed in 2005 with a maximum capacity of 2,205 lbs of polystyrene beads per batch and a batch time of 5 hours, exhausting to stack identified as S11 with no control.

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

…

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(~~g~~**f**) One (1) ~~Paint/~~Ink Application System, identified as U14, constructed in 2017, **approved in 2020 for modification,** with a maximum capacity of ~~0.33 gal/hr of paint and 0.115~~ **0.25** gal/hr of ink, using ~~a low-pressure spray gun~~ **an automated spray head**, uncontrolled, and exhausting indoors.

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

…

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 June 29, 2020.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 165-43005-00081. The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Doug Logan, 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) 234-5328 or (800) 451-6027, and ask for Doug Logan or (317) 234-5328.

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

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

Appendix A: Emission Calculations
Emissions Summary

Company Name: New NGC, Inc. d/b/a National Gypsum Company
Source Address: 75 Ivy Lane, Clinton, Indiana 47842
SPR Number: 165-43005-00081
Permit Reviewer: Doug Logan
Date: 8/25/2020

Uncontrolled Potential to Emit (tons/yr)								
Emission Unit/ID	**PM**	**PM_{10}**	**$PM_{2.5}$[1]**	**SO_2**	**NOx**	**VOC**	**CO**	**Combined HAPs**
Storage Silos and Bins (U1, U2, U3, U4, U5, U6, U7, U8, U9)	1,382.70	1,382.70	1,382.70	–	–	–	–	–
Conveying/Mixing (U10)	251.54	251.54	251.54	–	–	–	–	–
Board Sawing (U11)	187.71	187.71	187.71	–	–	–	–	–
Sand storage room (U13)	0.21	0.10	0.10	–	–	–	–	–
Insignificant Activities-Boiler and Space Heaters	7.48E-02	0.30	0.30	2.36E-02	3.94	0.22	3.31	7.43E-02
Polystyrene Expansion, Aging, and Drying System (U12)	–	–	–	–	–	144.87	–	–
Ink System (U14)	0	0	0	-	-	7.52	-	-
Aluminate receiver and day bin (U15)	15.99	15.99	15.99	-	-	-	-	-
Hydrated lime receiver and day bin (U16)	15.99	15.99	15.99	-	-	-	-	-
Total excluding fugitives[2]	**1,854.22**	**1,854.34**	**1,854.34**	**2.36E-02**	**3.94**	**152.61**	**3.31**	**7.43E-02**
Fugitive Emissions								
Unpaved Roads	0.98	0.26	0.03	-	-	-	-	-
Paved Roads	2.27	0.45	0.11	-	-	-	-	-
Total	**1857.47**	**1855.05**	**1854.47**	**0.02**	**3.94**	**152.61**	**3.31**	**7.43E-02**

Notes:
1. *$PM_{2.5}$ is direct $PM_{2.5}$*
2. *Total excluding fugitives for determining Part 70 and PSD applicability*

Potential to Emit After Issuance (tons/yr)								
Emission Unit/ID	**PM**	**PM_{10}**	**$PM_{2.5}$[1]**	**SO_2**	**NOx**	**VOC**	**CO**	**Combined HAPs**
Storage Silos and Bins (U1, U2, U3, U4, U5, U6, U7, U8, U9)	18.53	18.53	18.53	–	–	–	–	–
Conveying/Mixing (U10)	2.52	2.52	2.52	–	–	–	–	–
Board Sawing (U11)	1.88	1.88	1.88	–	–	–	–	–
Sand storage room (U13)	0.21	0.10	0.10					
Insignificant Activities-Boiler and Space Heaters	7.48E-02	0.30	0.30	2.36E-02	3.94	0.22	3.31	7.43E-02
Polystyrene Expansion, Aging, and Drying System (U12)	–	–	–	–	–	52.50	–	–
Ink System (U14)	0	0	0	-	-	7.52	-	-
Aluminate receiver and day bin (U15)	15.99	15.99	15.99	-	-	-	-	-
Hydrated lime receiver and day bin (U16)	15.99	15.99	15.99	-	-	-	-	-
Total	**55.19**	**55.30**	**55.30**	**2.36E-02**	**3.94**	**60.24**	**3.31**	**7.43E-02**

Notes:
1. *$PM_{2.5}$ is direct $PM_{2.5}$*

Appendix A: Emission Calculations
Revision Summary

Company Name: New NGC, Inc. d/b/a National Gypsum Company
Source Address: 75 Ivy Lane, Clinton, Indiana 47842
SPR Number: 165-43005-00081
Permit Reviewer: Doug Logan
Date: 8/25/2020

PTE Before Controls of the New Units (tons/yr)								
Emission Unit/ID	**PM**	**PM_{10}**	**$PM_{2.5}$[1]**	**SO_2**	**NOx**	**VOC**	**CO**	**Combined HAPs**
Aluminate receiver and day bin, U15	15.99	15.99	15.99	-	-	-	-	-
Hydrated lime receiver and day bin, U16	15.99	15.99	15.99	-	-	-	-	-
Total	**31.99**	**31.99**	**31.99**	**-**	**-**	**-**	**-**	**-**

Uncontrolled PTE of the Modified Emissions Units Before this Modification[2] (tons/yr)								
Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$[1]**	**SO_2**	**NOx**	**VOC**	**CO**	**Combined HAPs**
Portland cement silo, U4	206.26	206.26	206.26	-	-	-	-	-
Cementitious blending powders silo, U5	206.26	206.26	206.26	-	-	-	-	-
Aluminate silo, U6	206.26	206.26	206.26	-	-	-	-	-
Sand storage and handling system, U13	0.07	0.07	0.07	-	-	-	-	-
Paint/ink system, U14	0.92	0.92	0.92	-	-	11.22	-	-

Uncontrolled PTE of the Modified Emissions Units After this Modification (tons/yr)								
Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$[1]**	**SO_2**	**NOx**	**VOC**	**CO**	**Combined HAPs**
Hydrated lime silo, U4	206.26	206.26	206.26	-	-	-	-	-
Aluminate silo, U5	206.26	206.26	206.26	-	-	-	-	-
Cementitious blending powders silo, U6	206.26	206.26	206.26	-	-	-	-	-
Sand storage and handling system, U13	0.21	0.10	0.10					
Ink system, U14	0	0	0	-	-	7.52	-	-

PTE Increase of the Modified Emissions Units (tons/yr)								
Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$[1]**	**SO_2**	**NOx**	**VOC**	**CO**	**Combined HAPs**
Hydrated lime silo, U4	0	0	0	-	-	-	-	-
Aluminate silo, U5	0	0	0	-	-	-	-	-
Cementitious blending powders silo, U6	0	0	0	-	-	-	-	-
Sand storage and handling system, U13	0.14	0.03	0.03	-	-	-	-	-
Ink system, U14	0	0	0	-	-	0	-	-
Total PTE Increase	0.14	0.03	0.03	-	-	0	-	-

PTE Increase Due to the Revisions (tons/yr)								
Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$[1]**	**SO_2**	**NOx**	**VOC**	**CO**	**Combined HAPs**
PTE of the New Units	31.99	31.99	31.99	-	-	-	-	-
PTE Increase of the Modified Units	0.14	0.03	0.03	-	-	0	-	-
Total PTE of the Revision	32.12	32.01	32.01	**-**	**-**	**0**	**-**	**-**

Notes:

1. $PM_{2.5}$ is direct $PM_{2.5}$

2. Values from TSD App A, FESOP Renewal No. 165-40533-00081, issued on July 10, 2019

Appendix A: Emission Calculations
Particulate (PM/PM10/PM2.5)

Company Name: New NGC, Inc. d/b/a National Gypsum Company
Source Address: 75 Ivy Lane, Clinton, Indiana 47842
SPR Number: 165-43005-00081
Permit Reviewer: Doug Logan
Date: 8/25/2020

1. Controlled Operations

Description	Unit ID	Throughput (lb/hr)	Annual Operating Hours	Operating Flow Rate (scfm)	Outlet Grain Loading (gr/dscf)	Control Efficiency	$PM/PM_{10}/PM_{2.5}$[1] Controlled PTE (lb/hr)	Controlled PTE (tons/yr)	Uncontrolled PTE (lb/hr)	Uncontrolled PTE (tons/yr)	PSD PTE (lb/hr)[2]	PSD PTE (tons/yr)
Fly Ash Silo #1	U1	9,200	8,760	2,747	0.02	99%	0.47	2.06	47.09	206.26	0.47	2.06
Fly Ash Silo #2	U2		8,760	2,747	0.02	99%	0.47	2.06	47.09	206.26	0.47	2.06
Portland Cement Silo	U3	6,000	8,760	2,747	0.02	99%	0.47	2.06	47.09	206.26	0.47	2.06
Hydrated Lime Silo	U4	200	8,760	2,747	0.02	99%	0.47	2.06	47.09	206.26	0.47	2.06
Aluminate Storage Silo	U5	540	8,760	2,747	0.02	99%	0.47	2.06	47.09	206.26	0.47	2.06
Cementitious Blending Powder Silo	U6	1,760	8,760	2,747	0.02	99%	0.47	2.06	47.09	206.26	0.47	2.06
Fly Ash Receiver and Day Bin	U7	9,200	8,760	860	0.02	99%	0.15	0.65	14.74	64.57	0.47	2.06
Portland Cement Receiver and Day Bin	U8	6,000	8,760	860	0.02	99%	0.15	0.65	14.74	64.57	0.47	2.06
Cementitious Blending Powder Receiver and Day Bin	U9	1,760	8,760	213	0.02	99%	0.04	0.16	3.65	15.99	0.47	2.06
Total of units subject to FESOP and PSD limits									*315.69*	*1,382.70*	*4.23*	*18.53*
Aluminate Receiver and Day Bin	U15	540	8,760	213	0.02	99%	0.04	0.16	3.65	15.99	3.65	15.99
Hydrated Lime Receiver and Day Bin	U16	200	8,760	213	0.02	99%	0.04	0.16	3.65	15.99	3.65	15.99

Description	Unit ID	Throughput (lb/hr)	Annual Operating Hours	Operating Flow Rate (scfm)	Outlet Grain Loading (gr/dscf)	Control Efficiency	$PM/PM_{10}/PM_{2.5}$[1] Controlled PTE (lb/hr)	Controlled PTE (tons/yr)	Uncontrolled PTE (lb/hr)	Uncontrolled PTE (tons/yr)	PSD PTE (lb/hr)[2]	PSD PTE (tons/yr)
Wet End Operations	U10	21,000	8,760	3,350	0.02	99%	0.57	2.52	57.43	251.54	0.57	2.50

Description	Unit ID	Throughput (ft^2/hr)	Annual Operating Hours	Operating Flow Rate (scfm)	Outlet Grain Loading (gr/dscf)	Control Efficiency	$PM/PM_{10}/PM_{2.5}$[1] Controlled PTE (lb/hr)	Controlled PTE (tons/yr)	Uncontrolled PTE (lb/hr)	Uncontrolled PTE (tons/yr)	PSD PTE (lb/hr)[2]	PSD PTE (tons/yr)
Board Sawing	U11	52	8,760	2,500	0.02	99%	0.43	1.88	42.86	187.71	0.43	1.88

Notes:
1. PM_{10} and $PM_{2.5}$ are presumed equal to PM for the most conservative analysis
2. PSD minor limits in (lb/hr) from FESOP Renewal No. 165-40533-00081, issued on July 10, 2019

Methodology
Controlled PTE (lb/hr) = Operating Flow Rate (scfm) x Outlet Grain Loading (gr/dscf) x 60 (min/hr) / 7,000 (gr/lb)
Uncontrolled PTE (lb/hr) = Controlled PTE (lb/hr) / [1 - (Control Efficiency (%)/100)]
PTE (tons/yr) = PTE (lb/hr) x 8,760 (hr/yr) / 2,000 (lb/ton)

2. Uncontrolled Operations

Description	Unit ID	Throughput (lb/hr)	Annual Operating Hours	Number of Transfers[1]	PM Emission Factor[2] (lb/ton)	PM Uncontrolled PTE (lb/hr)	PM Uncontrolled PTE (tons/yr)	$PM_{10}/PM_{2.5}$[3] Emission Factor[2] (lb/ton)	$PM_{10}/PM_{2.5}$[3] Uncontrolled PTE (lb/hr)	$PM_{10}/PM_{2.5}$[3] Uncontrolled PTE (tons/yr)
Sand Storage Room	U13	14,860	8,760	3	0.0021	4.68E-02	0.21	0.00099	2.21E-02	0.10

Notes:
1. Conservative count of three transfers of sand (delivery, transfer to indoor storage by front end loader, discharge from a front end loader to the weigh hopper).
2. Emission Factors from AP-42, Chapter 11.12 Table 11.12-2, SCC #3-05-011-05,22,24
3. $PM_{2.5}$ is presumed equal to PM_{10} for the most conservative analysis because the reference does not include an emission factor for $PM_{2.5}$.

Methodology
Uncontrolled PTE (lb/hr) = [Throughput (lb/hr) / 2,000 (lb/ton] x Emission Factor (lb/ton) x Number of Transfers
PTE (tons/yr) = PTE (lb/hr) x 8,760 (hr/yr) / 2,000 (lb/ton)

Appendix A: Emission Calculations
One (1) Polystyrene Expansion, Aging, and Drying System

Company Name: New NGC, Inc. d/b/a National Gypsum Company
Source Address: 75 Ivy Lane, Clinton, Indiana 47842
SPR Number: 165-43005-00081
Permit Reviewer: Doug Logan
Date: 8/25/2020

Unlimited PTE of VOC		**Limited PTE of VOC**	
Batch size (lbs/batch) =	2,205		
Process time (hours/hour-batch) =	5.00		
Maximum Operating Hours (hours/year) =	8,760		
Maximum Throughput Rate (lbs/year) =	3,863,160	Limited Throughput Rate (tons/year) =	700
VOC/Polystyrene Pentane Weight % =	7.50%	VOC/Polystyrene Pentane Weight % =	7.50%
Unlimited PTE of VOC/Pentane (tons/year) =	**144.87**	Limited PTE of VOC/Pentane (tons/year) =	52.50

Assume all VOC emissions are equal to Pentane emissions
The Permittee operates the polystyrene expansion system in batch mode and it takes 5 hours of process time (utilizing 2,205 pounds per batch) from start of a batch to the start of the next batch.
Weight % VOC per ton of Polystyrene material processed = 7.5 % based on MSDS sheet provided by the source.

METHODOLOGY
Unlimited PTE of VOC:
Maximum Throughput Rate (lbs/year) = Weight of Batch (lbs/batch) * 1 Batch/ 5 hours * 8760 hours/year
Unlimited PTE of VOC/Pentane (tons/year) = Maximum Througput Rate (lbs/year) * Weight % VOC/Polystyrene Pentane * 1 ton/2000 lbs

Limited PTE of VOC:
Limited PTE of VOC/Pentane (tons/year) = Limited Througput Rate (tons/year) * Weight % VOC/Polystyrene Pentane

Appendix A: Emission Calculations
Natural Gas Combustion Only
Insignificant Activities-Boiler and Space Heaters
MM BTU/HR <100

Company Name: New NGC, Inc. d/b/a National Gypsum Company
Source Address: 75 Ivy Lane, Clinton, Indiana 47842
SPR Number: 165-43005-00081
Permit Reviewer: Doug Logan
Date: 8/25/2020

Heat Input Capacity	Total Heat Input Capacity MMBtu/hr
Boiler #1	3.188
Large Space Heaters	5.28
Small Space Heaters	0.50
Water Heater	0.20
Total	**9.168**

HHV mmBtu / mmscf	Potential Throughput MMCF/yr
1020	78.7

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.07	0.30	0.30	0.02	3.94	0.22	3.31

*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					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	8.3E-05	4.7E-05	3.0E-03	0.07	1.3E-04	**0.07**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.0E-05	4.3E-05	5.5E-05	1.5E-05	8.3E-05	**2.2E-04**
					Total HAPs	**0.07**
					Worst HAP	**0.07**

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

Appendix A: Emission Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: New NGC, Inc. d/b/a National Gypsum Company
Source Address: 75 Ivy Lane, Clinton, Indiana 47842
SPR Number: 165-43005-00081
Permit Reviewer: Doug Logan
Date: 8/25/2020

Material	Density (lbs/gal)	Weight % Volatile (water, VOC, and exempt compounds*)	Weight % water and exempt compounds*	Weight % VOC	Volume % water and exempt compounds*	Volume % Solids	Application Rate (gal/hr)	Maximum Material Usage (gal/day)	Pounds VOC per gallon of coating less water and exempt compounds	Pounds VOC per gallon of coating	PTE of VOC (lbs/hour)	PTE of VOC (lbs/day)	PTE of VOC (tons/year)	Uncontrolled PTE of PM/PM10/PM2.5 (tons/year)	Pounds VOC per gallon of coating solids	Transfer Efficiency
PX170 Black Board Ink	6.87	100%	0%	100%	0%	100.00%	0.250	6.00	6.87	6.87	1.72	41.22	7.52	0	6.87	100%
							Total:	**6.00**			**1.72**	**41.22**	**7.52**	**0**		

Methodology
*Exempt compounds include all compounds specifically exempted from the definition of volatile organic compounds (VOC) under 40 CFR 51.100(s).
Weight % VOC = [Weight % Volatile (water, VOC, and exempt Compounds*)] - [Weight % water and exempt Compounds]
Maximum Material Usage (gal/day) = [Maximum Material Usage (gal/unit)] * [Maximum Capacity (units/hour)] * [24 hours/day]
Pounds of VOC per gallon coating less water and exempt Compounds = [Density (lbs/gal)] * [Weight % VOC] / [1 - (Volume % water and exempt Compounds)]
Pounds of VOC per gallon coating = [Density (lbs/gal)] * [Weight % VOC]
PTE of VOC (lbs/hour) = [Maximum Material Usage (gal/unit)] * [Maximum Capacity (units/hour)] * [Pounds of VOC per gallon coating]
PTE of VOC (lbs/day) = [PTE of VOC (lbs/hour)] * [24 hours/day]
PTE of VOC (tons/year) = [PTE of VOC (lbs/hour)] * [8760 hours/year]* [1 ton/2000 lbs]
Uncontrolled PTE of PM/PM10/PM2.5 (tons/year) = [Density (lbs/gal)] * [Maximum Material Usage (gal/unit)] * [Maximum Capacity (units/hour)] * [1 - Weight % Volatile)] * [1 - Transfer Efficiency)] * [8760 hour/year] * [1 ton/2000 lbs]
Pounds VOC per gallon of coating solids = [Density (lbs/gal)] * [Weight % VOCs] / [Volume % Solids]

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads

Company Name: New NGC, Inc. d/b/a National Gypsum Company
Source Address: 75 Ivy Lane, Clinton, Indiana 47842
SPR Number: 165-43005-00081
Permit Reviewer: Doug Logan
Date: 8/25/2020

Unpaved Roads at Industrial Site
The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
trash truck (entering plant) (one-way trip)	1.0	0.6	0.6	8.1	4.9	263	0.050	0.0	10.9
trash truck (leaving plant) (one-way trip)	1.0	0.6	0.6	8.1	4.9	263	0.050	0.0	10.9
trailer truck (drop trailers into gravel lot)	4.0	1.0	4.0	48.0	192.0	500	0.095	0.4	138.3
trailer truck (drop trailers out of gravel lot)	4.0	1.0	4.0	48.0	192.0	500	0.095	0.4	138.3
		Totals	**9.2**		**393.7**			**0.8**	**298.3**

Average Vehicle Weight Per Trip = 42.8 tons/trip
Average Miles Per Trip = 0.09 miles/trip

Unmitigated Emission Factor, Ef = k*[(s/12)^a]*[(W/3)^b] (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	6.0	6.0	6.0	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Iron and Steel Production)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	42.8	42.8	42.8	tons = average vehicle weight
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [(365 - P)/365] (Equation 2 from AP-42 13.2.2)
Mitigated Emission Factor, Eext = E * [(365 - P)/365]
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	9.97	2.66	0.27	lb/mile
Mitigated Emission Factor, Eext =	6.56	1.75	0.17	lb/mile

Process	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
trash truck (entering plant) (one-way trip)	0.04	0.01	0.00
trash truck (leaving plant) (one-way trip)	0.04	0.01	0.00
trailer truck (drop trailers into gravel lot)	0.45	0.12	0.01
trailer truck (drop trailers out of gravel lot)	0.45	0.12	0.01
Totals	**0.98**	**0.26**	**0.03**

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

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
PTE = Potential to Emit

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: New NGC, Inc. d/b/a National Gypsum Company
Source Address: 75 Ivy Lane, Clinton, Indiana 47842
SPR Number: 165-43005-00081
Permit Reviewer: Doug Logan
Date: 8/25/2020

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

Vehicle Informtation (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
trucks (entering plant) (one-way trip)	14.0	1.0	14.0	48.0	672.0	860	0.163	2.3	832.3
trucks (leaving plant) (one-way trip)	14.0	1.0	14.0	16.0	224.0	860	0.163	2.3	832.3
		Totals	**28.0**		**896.0**			**4.6**	**1664.6**

Average Vehicle Weight Per Trip = 32.0 tons/trip
Average Miles Per Trip = 0.16 miles/trip

Unmitigated Emission Factor, Ef = [k * (sL)^0.91 * (W)^1.02] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	32.0	32.0	32.0	tons = average vehicle weight
sL =	9.7	9.7	9.7	g/m^2 = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)
Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	2.983	0.597	0.1464	lb/mile
Mitigated Emission Factor, Eext =	2.727	0.545	0.1339	lb/mile

Process	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
trucks (entering plant) (one-way trip)	1.13	0.23	0.06
trucks (leaving plant) (one-way trip)	1.13	0.23	0.06
Totals	**2.27**	**0.45**	**0.11**

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

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

September 10, 2020

George Schmalz
New NGC, Inc. d/b/a National Gypsum Company
75 Ivy Lane
Clinton, IN 47842

Re: Public Notice
New NGC, Inc. d/b/a National Gypsum Company
Permit Level: FESOP Sig Permit Rev Minor PSD
Permit Number: 165-43005-00081

Dear Mr. Schmalz:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, **are available electronically at**:

IDEM's online searchable database: http://www.in.gov/apps/idem/caats/ . Choose Search Option **by Permit Number**, then enter permit 43005

and

IDEM's Virtual File Cabinet (VFC): http://www.IN.gov/idem. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

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 Clinton Public Library, 313 South 4th Street in Clinton, IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the draft permit 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 Doug Logan, 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 4-5328 or dial (317) 234-5328.

Sincerely,

Theresa Weaver

Theresa Weaver
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter access via website 8/10/2020

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

September 10, 2020

To: Clinton Public Library

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

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

Applicant Name: New NGC, Inc. d/b/a National Gypsum Company
Permit Number: 165-43005-00081

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 Smiddie-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

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Notice of Public Comment

September 10, 2020
New NGC, Inc. d/b/a National Gypsum Company
165-43005-00081

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 Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@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 2/28/2020

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Governor

Bruno L. Pigott
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

September 10, 2020

A 30-day public comment period has been initiated for:

Permit Number: **165-43005-00081**
Applicant Name: **New NGC, Inc. d/b/a National Gypsum Company**
Location: **Clinton, Vermillion County, Indiana**

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:
http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification 1/9/2017

Mail Code 61-53

IDEM Staff	TAWEAVER 9/10/2020 NEW NGC INC D B A NATIONAL GYPSUM COMPANY 165-43005-00081 (draft)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		George Schmalz New NGC Inc DBA National Gypsum Company 75 Ivy Ln Clinton IN 47842 (Source CAATS)									
2		Clinton City Council and Mayors Office 259 Vine Street Clinton IN 47842 *(Local Official)*									
3		Vermillion County Health Department 257 Walnut Street Clinton IN 47842-2342 *(Health Department)*									
4		Clinton Public Library 313 S 4th St Clinton IN 47842-2398 *(Library)*									
5		Vermillion County Commissioners P.O. Box 190 Newport IN 47966 *(Local Official)*									
6		J.P. Roehm PO Box 303 Clinton IN 47842 *(Affected Party)*									
7		Dana Town Council PO Box 371 Dana IN 47847 *(Local Official)*									
8		Tina Berceli-Boyle Haley & Aldrich 3 Bedford Farms Drive Bedford NH 03110 *(Consultant)*									
9		Mr. Mark Fitton Tribune-Star 222 S. 7th Street Terre Haute IN 47807 *(Affected Party)*									
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