



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(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 the Renewal of a
Minor Source Operating Permit (MSOP)

for American Plastic Molding in Scott County
MSOP Renewal No.: M143-42892-00021

The Indiana Department of Environmental Management (IDEM) has received an application from American Plastic Molding, located at 965 South Elm Street and 915 Elm Street, Scottsburg, IN 47170-2173, for a minor source modification and renewal of its MSOP issued on October 1, 2015. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow American Plastic Molding to make certain changes at its existing source. American Plastic Molding has applied to the addition of new emission units that are replacing other emission units.

A copy of the permit application and IDEM's preliminary findings have been sent to:

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

and

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

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

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 M143-42892-00021 in all correspondence.

Comments should be sent to:

Nicholas Walters
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Nicholas Walters or (317) 234-9513
Or dial directly: (317) 234-9513
Fax: (317) 232-6749 attn: Nicholas Walters
E-mail: nbwalter@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, IDEM Southeast Regional Office, 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 Nicholas Walters of my staff at the above address.



Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality



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Eric J. Holcomb
Governor

DRAFT

Bruno L. Pigott
Commissioner

**Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY**

**American Plastic Molding
965 South Elm Street and 915 Elm Street,
Scottsburg, IN 47170-2173**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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

Operation Permit No.: M143-42892-00021	
Master Agency Interest ID: 107142	
Issued by:	Issuance Date:
Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Expiration Date:

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary plastic parts manufacturer.

Source Address:	965 South Elm Street and 915 Elm Street, Scottsburg, IN 47170-2173
General Source Phone Number:	812-752-7000
SIC Code:	3089 (Plastic Products, Not Elsewhere Classified)
County Location:	Scott
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Source Definition

This existing plastic parts operation consists of two (2) plants:

- (a) Plant 1 is located at 965 South Elm Street, Scottsburg, IN 47170; and
- (b) Plant 2 (Southern Mold and Tool) is located 915 Elm Street, on the northern part of the property.

These plants are located on adjacent properties, have the same SIC codes of 3089 and are under common control; therefore, they will be considered one (1) source, as defined by 326 IAC 2-7-1(22).

This determination was initially made under MSOP No. 143-35977-00021, issued on October 1, 2015.

A.3 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) closed injection molding operation, identified as EU-01, consisting of forty-two (42) plastic injection molding machines, constructed between 1975 and 2014 and modified in 2019, with a combined maximum throughput capacity of 6,715 pounds per hour of raw materials, each molding machine with a maximum capacity of 0.19 tons/hour, using no controls, and exhausting inside the building.

This closed injection molding operation was modified in 2019 by adding 18 plastic injection molding machines and increasing the maximum capacity.

- (b) One (1) Grinding station, identified as EU-02, consisting of fifty-four (54) portable grinders, constructed between 1983 and 2014, modified in 2019, each with a maximum throughput capacity of 900 pounds per hour, with a combined maximum throughput capacity of 23,370 pounds per hour, each grinder with a maximum capacity of 0.45

tons/hour, using no controls, and exhausting inside the building.

This grinding station was modified in 2019 by adding 5 portable grinders and increasing the maximum capacity.

- (c) One (1) Material Transfer operation, identified as EU-03, constructed in 1975, consisting of a pneumatic transfer system which moves resin from four silos to four of the injection molding machines within the plant, with a combined maximum throughput capacity of 12,670 pounds of pellets per hour (6.34 tons/hour), using cyclones and fabric filters for control, and exhausting inside the building.
- (d) One (1) Assembly Area, identified as EU-04, constructed in 1975, using adhesives, inks, and solvent containing materials during the assembly process, with a maximum throughput of 516 gallons per year, using no controls, and exhausting into the building.
- (e) Two (2) Maintenance Manual Welding Stations, located in Plant 1 and Plant 2, collectively identified as EU-05, constructed in 1975, with a maximum throughput of 2.25 pounds per hour, using no controls, exhausting in the building.
- (f) Two (2) Maintenance Parts washers, located in Plant 1 and Plant 2, collectively identified as EU-06, constructed in 1975 and 2015, each with a maximum capacity of thirty (30) gallons, using no controls, and exhausting into the building.
- (g) One (1) Shot Blaster, located in Plant 2, identified as EU-07, constructed in 2015, using 1/4 inch nozzle with a maximum nozzle pressure of 100 psi, with a maximum capacity of 309 pounds per hour (0.15 ton/hour), using fabric filters for controls, and exhausting in the building.
- (h) One (1) Machining Operation, located in Plant 2, identified as EU-08, constructed in 2015 and modified in 2019, with a combined throughput capacity of 5,670 pounds per hour (2.84 tons/hour), using Computerized Numerical Control (CNC) machines, Electrical Discharge Machines (EDM), lathes, surface grinders, vertical milling machines, and boring machines. The EDMs perform machining operations while under water or in a dielectric fluid, therefore do not produce emissions.

Two CNC machines shape metal and graphite parts, controlled by a baghouse. The remaining fifteen (15) machines include lathes, surface grinders, vertical milling machines, drills, and a contour saw, controlled with a cartridge filter.

This machining operation was modified in 2019 by adding 6 units and increasing the maximum capacity.
- (i) Fourteen (14) Natural gas-fired heaters, collectively identified as EU-09, constructed in 1975 and 2014, with a combined maximum heat input capacity of 4.014 MMBtu/hr, and exhausting inside the building.
- (j) Paved and unpaved roads.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M143-42892-00021, 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

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

- (a) 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 Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M143-42892-00021 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and

- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

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

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

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

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

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.

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

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

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

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.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.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 2-6.1-5(a)(2)]

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

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

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

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

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

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

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

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

C.14 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, startups or shutdowns of any emission unit or emission control equipment, that results in violations of applicable air pollution control regulations or applicable emission limitations must be kept and retained for a period of three (3) years and be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any emission unit or emission control equipment occurs that lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.
- (c) Failure to report a malfunction of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information on the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-1.1-11][326 IAC 2-6.1-2][IC 13-14-1-13]

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) closed injection molding operation, identified as EU-01, consisting of forty-two (42) plastic injection molding machines, constructed between 1975 and 2014 and modified in 2019, with a combined maximum throughput capacity of 6,715 pounds per hour of raw materials, each molding machine with a maximum capacity of 0.19 tons/hour, using no controls, and exhausting inside the building.

This closed injection molding operation was modified in 2019 by adding 18 plastic injection molding machines and increasing the maximum capacity.

- (b) One (1) Grinding station, identified as EU-02, consisting of fifty-four (54) portable grinders, constructed between 1983 and 2014, modified in 2019, each with a maximum throughput capacity of 900 pounds per hour, with a combined maximum throughput capacity of 23,370 pounds per hour, each grinder with a maximum capacity of 0.45 tons/hour, using no controls, and exhausting inside the building.

This grinding station was modified in 2019 by adding 5 portable grinders and increasing the maximum capacity.

- (c) One (1) Material Transfer operation, identified as EU-03, constructed in 1975, consisting of a pneumatic transfer system which moves resin from four silos to four of the injection molding machines within the plant, with a combined maximum throughput capacity of 12,670 pounds of pellets per hour (6.34 tons/hour), using cyclones and fabric filters for control, and exhausting inside the building.

- (g) One (1) Shot Blaster, located in Plant 2, identified as EU-07, constructed in 2015, using 1/4 inch nozzle with a maximum nozzle pressure of 100 psi, with a maximum capacity of 309 pounds per hour (0.15 ton/hour), using fabric filters for controls, and exhausting in the building.

- (h) One (1) Machining Operation, located in Plant 2, identified as EU-08, constructed in 2015 and modified in 2019, with a combined throughput capacity of 5,670 pounds per hour (2.84 tons/hour), using Computerized Numerical Control (CNC) machines, Electrical Discharge Machines (EDM), lathes, surface grinders, vertical milling machines, and boring machines. The EDMs perform machining operations while under water or in a dielectric fluid, therefore do not produce emissions.

Two CNC machines shape metal and graphite parts, controlled by a baghouse. The remaining fifteen (15) machines include lathes, surface grinders, vertical milling machines, drills, and a contour saw, controlled with a cartridge filter.

This machining operation was modified in 2019 by adding 6 units and increasing the maximum capacity.

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

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

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

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

Emission Unit/Operation	P (ton/hr)	E (lb/hr)
Closed Injection Molding Operation (each plastic injection molding machine)	0.19	1.34
Grinding Station (each grinder)	0.45	2.40
Material Transfer Operation	6.34	14.12
Shot blaster	0.15	1.17
Machining Operation	2.84	8.24

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

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

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

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

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

Compliance Determination Requirements

D.1.3 Particulate Control

In order to comply with Condition D.1.1, the fabric filters for particulate control shall be in operation and control emissions from the shot blaster at all times the shot blaster is in operation.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(1)]

D.1.4 Semi-Annual Fabric Filter Inspections

The Permittee shall perform semi-annual inspections of the Fabric Filters controlling particulate emissions from the shot blaster, identified as EU-07, to verify that it is 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 filters shall be replaced.

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

D.1.5 Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.4, the Permittee shall maintain records of the dates and results of the semi-annual inspections required under Condition D.1.4.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (f) Two (2) Maintenance Parts washers, located in Plant 1 and Plant 2, collectively identified as EU-06, constructed in 1975 and 2015, each with a maximum capacity of thirty (30) gallons, using no controls, and exhausting into the building.

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

- (a) Pursuant to 326 IAC 8-3-2(a), the Permittee shall ensure the following control equipment and operating requirements are met:
- (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Pursuant to 326 IAC 8-3-2(b), the Permittee shall ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the

department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
- (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.

D.2.2 Volatile Organic Compounds (VOC) [326 8-3-8]

Pursuant to 326 IAC 8-3-8(a), the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty eight (68) degrees Fahrenheit).

D.2.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

D.2.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.2, the Permittee shall maintain each of the following records for each purpose:
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill date of contract servicer indicating service date).
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty eight (68) degrees Fahrenheit).
 - (6) All records required by Condition D.2.1(a)(1) through (5) shall be:
 - (A) retained on-site or accessible electronically from the site for the most recent three (3) year period; and
 - (B) reasonably accessible for an additional two (2) year period.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required to be maintained by this condition.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	American Plastic Molding
Source Address:	965 South Elm Street and 915 Elm Street
City:	Scottsburg, Indiana 47170-2173
Phone #:	812-752-7000
MSOP #:	M143-42892-00021

I hereby certify that American Plastic Molding is:

still in operation.

no longer in operation.

I hereby certify that American Plastic Molding is:

in compliance with the requirements of MSOP M143-42892-00021.

not in compliance with the requirements of MSOP M143-42892-00021.

Authorized Individual (typed):
Title:
Signature:
Date:

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

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865**

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? _____, 25 TONS/YEAR SULFUR DIOXIDE ? _____, 25 TONS/YEAR NITROGEN OXIDES? _____, 25 TONS/YEAR VOC ? _____, 25 TONS/YEAR HYDROGEN SULFIDE ? _____, 25 TONS/YEAR TOTAL REDUCED SULFUR ? _____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? _____, 25 TONS/YEAR FLUORIDES ? _____, 100 TONS/YEAR CARBON MONOXIDE ? _____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ? _____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? _____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ? _____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ? _____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

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

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

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

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Minor Source Operating Permit (MSOP) Renewal
with Significant Permit Revision

Source Description and Location

Source Name:	American Plastic Molding
Source Location:	965 South Elm Street and 915 Elm Street, Scottsburg, IN 47170-2173
County:	Scott
SIC Code:	3089 (Plastic Products, Not Elsewhere Classified)
Permit Renewal No.:	M 143-42892-00021
Permit Reviewer:	Nicholas Walters

On May 26, 2020, American Plastic Molding submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from American Plastic Molding relating to the operation of a stationary plastic parts manufacturer. American Plastic Molding was issued its first MSOP (M143-35977-00021) on October 1, 2015.

In addition, this TSD documents permit review of modifications made to existing emissions units and construction of unpermitted emissions units.

Source Definition

This existing plastic parts operation consists of two (2) plants:

- (a) Plant 1 is located at 965 South Elm Street, Scottsburg, IN 47170; and
- (b) Plant 2 (Southern Mold and Tool) is located 915 Elm Street, on the northern part of the property.

These plants are located on adjacent properties, have the same SIC codes of 3089 and are under common control; therefore, they will be considered one (1) source, as defined by 326 IAC 2-7-1(22).

This determination was initially made under MSOP No. 143-35977-00021, issued on October 1, 2015.

Existing Approvals

The source was issued MSOP No. M143-35977-00021 on October 1, 2015. There have been no subsequent approvals issued.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

Note: units were added and removed from the source. Details for these units are listed in the "Description of Proposed Significant Permit Revision at an Existing Source" section below.

- (c) One (1) Material Transfer operation, identified as EU-03, constructed in 1975, consisting of a pneumatic transfer system which moves resin from four silos to four of the injection molding machines within the plant, with a combined maximum throughput capacity of 12,670 pounds of pellets per hour, using cyclones and fabric filters for control, and exhausting inside the building.
- (d) One (1) Assembly Area, identified as EU-04, constructed in 1975, using adhesives, inks, and solvent containing materials during the assembly process, with a maximum throughput of 516 gallons per year, using no controls, and exhausting into the building.
- (e) Two (2) Maintenance Manual Welding Stations, located in Plant 1 and Plant 2, collectively identified as EU-05, constructed in 1975, with a maximum throughput of 2.25 pounds per hour, using no controls, exhausting in the building.
- (f) Two (2) Maintenance Parts washers, located in Plant 1 and Plant 2, collectively identified as EU-06, constructed in 1975 and 2015, each with a maximum capacity of thirty (30) gallons, using no controls, and exhausting into the building.
- (g) One (1) Shot Blaster, located in Plant 2, identified as EU-07, constructed in 2015, using 1/4 inch nozzle with a maximum nozzle pressure of 100 psi, with a maximum capacity of 309 pounds per hour (0.15 ton/hour), using fabric filters for controls, and exhausting in the building.

- (j) Paved and unpaved roads.

Description of Proposed Significant Permit Revision to an Existing Source
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Pursuant to 326 IAC 2-6.1(i)(1)(E), this MSOP is revised through a 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 where there is an increase in potential to emit equal to or greater than twenty-five (25) tons per year of the following pollutants: PM.

Appendix A of this TSD reflects the detailed unrestricted potential emissions of these unpermitted units. These units were constructed and/or operated without a permit.

The following changes were made to the source:

- (a) One (1) closed injection molding operation, identified as EU-01, consisting of ~~thirty-eight (38)~~ **forty-two (42)** plastic injection molding machines, constructed between ~~1975~~ **1995** and ~~2014~~ **2019**, each with a maximum throughput capacity of ~~900~~ **900 pounds per hour**, with a combined maximum throughput capacity of ~~6,335~~ **6,715** pounds per hour of raw materials, **each molding machine with a maximum capacity of 0.19 tons/hour**, using no controls, exhausting inside the building.

Four (4) of the units were listed in Appendix A but not counted in the total listed in MSOP New Source Construction permit no. 143-35977-00021.

Eighteen (18) of plastic injection molding machines were added between 2014 and 2018 and replaced eighteen others:

Unpermitted New Units	Removed Units
MM-10c	MM-02
MM-11d	MM-04
MM-11e	MM-05
MM-11f	MM-06
MM-14v	MM-07
MM-20	MM-08
MM-21	MM-14
MM-26	MM-17
MM-27	MM-24
MM-36	MM-25
MM-43	MM-28
MM-48	MM-31
MM-53	MM-37
MM-54	MM-44
MM-57	MM-46
MM-63	MM-47
MM-64	MM-52
MM-65	MM-61

- (b) One (1) Grinding station, identified as EU-02, consisting of ~~forty-nine (49)~~ **fifty-four (54)** portable grinders, constructed between 1983 and ~~2014~~ **2019**, with a combined maximum throughput capacity of ~~21,070~~ **23,370** pounds per hour, **each grinder with a maximum capacity of 0.45 tons/hour**, using no controls, exhausting inside the building.

These are the five unpermitted (5) portable grinders added: GR-23, GR-60, GR-61, GR-62, GR-74.

- (c) One (1) Machining Operation, located in Plant 2, identified as EU-08, with a combined throughput capacity of ~~375~~ **5,670** pounds per hour (**2.84 ton/hour**), using Computerized Numerical Control (CNC) machines, Electrical Discharge Machines (EDM), lathes, surface grinders, vertical milling machines, and boring machines. The EDMs perform machining operations while under water or in a dielectric fluid, therefore do not produce emissions. Two CNC machines shape metal and graphite parts, controlled by a baghouse. The remaining fifteen (15) machines include lathes, surface grinders, vertical milling machines, drills, and a contour saw, controlled with a cartridge filter.

The following six (6) units were added, five (5) of the units replaced five (5) others:

Unpermitted New Units	Removed Units
HAAS VF-2 CNC Vertical Milling Center	Millport Vertical Milling Machine
Charmilles Form 30 CNC Sinker EDM	Bridgeport Series 12
Charmilles Robo Form 54 CNC Sinker EDM	Legun FTV-2 Vertical Milling Machine
Accutex 560SA	Universal Bore Mill
Accutex EDM Hole Start	Harig Surface Grinder
Okamoto Surface Grinder	

- (d) ~~Fifteen (15)~~ **Fourteen (14)** Natural gas-fired heaters, identified as EU-09, constructed **between 1975 and 2014**, with a combined maximum heat input capacity of ~~2,584~~ **2.43** MMBtu/hr, and exhausting inside the building.

One (1) Natural gas unit, B-Bay space heater, was removed.

Enforcement Issue

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

Emission Calculations

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

County Attainment Status

The source is located in Scott County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective August 3, 2018, for the 2015 8-hour ozone standard.
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	Unclassifiable effective November 15, 1990.
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.

- (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. Scott 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}
Scott County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Other Criteria Pollutants
Scott County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

The fugitive emissions of regulated air pollutants and hazardous air pollutants (HAP) are counted toward the determination of MSOP (326 IAC 2-6.1) applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

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

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

	Unrestricted Potential Emissions (ton/year)							
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1,2}	SO ₂	NO _x	VOC	CO	Total HAPs
Total PTE of Entire Source Including Fugitive Emissions*	236.08	43.51	42.66	0.01	1.05	5.94	3.61	1.88
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25
MSOP Thresholds	25	25	25	25	25	25	< 100	< 25
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 unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all regulated air pollutants is less than 100 tons per year. However, PM is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. The source will be issued an MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7. The source will be issued an MSOP Renewal.

Potential to Emit After Issuance

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) (Uncontrolled/Unlimited)							
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Total HAPs
Total PTE of Entire Source Excluding Fugitive Emissions*	236.08	43.51	42.66	0.01	1.05	5.94	3.61	1.88
Title V Major Source Thresholds	--	100	100	100	100	100	100	25
MSOP Thresholds	25	25	25	25	25	25	< 100	< 25
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 unlimited/uncontrolled emissions of the source.

- (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. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability

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

New Source Performance Standards (NSPS):

- (a) The requirements of the New Source Performance Standard for VOC Emissions from the Polymer Industry 40 CFR 60, Subpart DDD and 326 IAC 12, are not included in the permit for this source, because this source does not manufacture polypropylene, polyethylene, polystyrene, or polyethylene terephthalate, as defined in 40 CFR 60.561.
- (b) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning 40 CFR 63, Subpart T and are not included in the permit for this source, since the source does not use solvents that are halogenated.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Group I Polymers and Resins 40 CFR 63, Subpart U and are not included in the permit for this source, since the source does not use Group I polymers and resins, as defined in 63.480.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Generic MACT Standards 40 CFR 63, Subpart YY and are not included in the permit for this source, since the source is not a producer of chemicals defined in Table 63-1100(a).

- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Group IV Polymers and Resins 40 CFR 63, Subpart JJJ and are not included in the permit for this source, since the source is not a major source for HAPs.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Miscellaneous Organic Chemical Manufacturing 40 CFR 63, Subpart FFFF and are not included in the permit for this source, since the source does not fit the definition of a manufacturer of chemicals as defined in 63.2550, and is not a major source of HAPs.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts 40 CFR 63, Subpart PPPP and are not included in the permit for this source, since the source does not perform surface coating and is not a major source for HAPs.
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Reinforced Composites Production 40 CFR 63, Subpart WWWW and are not included in the permit for this source, since the source does not produce reinforced composites and is not a major source for HAPs.
- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Polyvinyl Chloride and Copolymers Production for Area Sources 40 CFR 63, Subpart DDDDDD and are not included in the permit for this source, since the source does not produce polyvinyl chloride and copolymers.
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Chemical Preparations Industry 40 CFR 63, Subpart BBBB and are not included in the permit for this source, since the source is not a chemical preparations plant, as defined in 63.11588.
- (l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Polyvinyl Chloride and Copolymers Production 40 CFR 63, Subpart HHHHHH and are not included in the permit for this source, since the source does not produce polyvinyl chloride and copolymers, as defined in 63.12005, and is not a major source for HAPs.
- (m) There are no National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

Compliance Assurance Monitoring (CAM):

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

State Rule Applicability - Entire Source

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

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

MSOP applicability is discussed under the Potential to Emit After Issuance section of this document.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, Clark, or Floyd County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1).

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

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

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-1(a), this source (located in Scott 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.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

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

State Rule Applicability - Individual Facilities

State rule applicability has been reviewed as follows:

Closed Injection Molding Operation (EU-01)

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

Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the Closed Injection Molding Operation, identified as EU-01, since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

There are forty-two (42) plastic injection molding machines in this operation, but, because each machine manufactures product, each is considered its own manufacturing operation, and, therefore, each is subject to the requirements of 326 IAC 6-3-2.

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the Closed Injection Molding Operation, identified as EU-01, shall not exceed 1.34 pounds per hour when operating at a process weight rate of 0.19 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

$P = \text{process weight rate in tons per hour}$
 $P = 0.19 \text{ tons/hour (This is based on the highest maximum capacity of the individual injection molding machine)}$

Summary of Process Weight Rate Limits			
Process / Emission Unit	P (ton/hr)	E (lb/hr)	Equation Used
Closed Injection Molding Operation (per injection molding machine)	0.19	1.34	$E = 4.10 P^{0.67}$

Based on calculations, no control equipment is needed to comply with this limit. This limit has changed in this renewal due to the addition of new plastic injection molding machines.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, the Closed Injection Molding Operation, Identified as EU-01, was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6, because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

Grinding Station (EU-02)

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

Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the Grinding Station, identified as EU-02, since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

There are fifty-four (54) portable grinders in the operation, but, because each machine manufactures product and has the potential to emit particulate, each is considered its own manufacturing operation, and, therefore, each is subject to the requirements of 326 IAC 6-3-2.

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the Grinding Station, identified as EU-02, shall not exceed 2.4 pounds per hour when operating at a process weight rate of 0.45 tons per hour. The pound per hour limitation was calculated with the following equation:

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

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour
P = 0.45 tons/hour (This is based on the highest max capacity of the individual machine)

Summary of Process Weight Rate Limits			
Process / Emission Unit	P (ton/hr)	E (lb/hr)	Equation Used
Grinding Station (per portable grinder)	0.45	2.4	$E = 4.10 P^{0.67}$

Based on calculations, no controls are not needed to comply with this limit. This limit has changed in this renewal due to the addition of new portable grinders.

Material Transfer Operation (EU-03)

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

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

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the material transfer operation shall not exceed 14.12 pounds per hour when operating at a process weight rate of 6.34 tons per hour. The pound per hour limitation was calculated with the following equation:

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

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour
P = 12,670 pounds/hour divided by 2,000 pounds/ton)
P = 6.34 tons/hour

Summary of Process Weight Rate Limits			
Process / Emission Unit	P (ton/hr)	E (lb/hr)	Equation Used
Material Transfer Operation	6.34	14.12	$E = 4.10 P^{0.67}$

Based on calculations, no controls are needed to comply with this limit. This is an existing limit and no change has been made in this renewal.

Assembly Area (EU-04)

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, the assembly area, identified as EU-04, was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6, because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

Manual Welding Stations (EU-05)

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

Pursuant to 326 IAC 6-3-1(b)9, the manual welding stations are not subject to the requirements of 326 IAC 6-3, since they consume less than 625 pounds of rod or wire per day.

Parts Washers (EU-06)

326 IAC 8-3-2 (Cold cleaner degreaser control equipment and operating requirements)

(a) Pursuant to 326 IAC 8-3-2(a), the Permittee shall ensure the following control equipment and operating requirements are met:

- (1) Equip the degreaser with a cover.
- (2) Equip the degreaser with a device for draining cleaned parts.
- (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
- (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
- (6) Store waste solvent only in closed containers.
- (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) Pursuant to 326 IAC 8-3-2(b), the Permittee shall ensure the following additional control equipment and operating requirements are met:

- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.

- (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
 - (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.

Shot blaster (EU-07)

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

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

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the shot blaster shall not exceed 1.17 pounds per hour when operating at a process weight rate of 0.15 tons per hour (309 pounds per hour divided by 2,000 pounds per ton). The pound per hour limitation was calculated with the following equation:

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

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

$$P = \text{process weight rate in tons per hour}$$

$$P = 309 \text{ pounds/ hour divided by } 2,000 \text{ pounds/ton)}$$

$$P = 0.15 \text{ ton/hour}$$

Summary of Process Weight Rate Limits			
Process / Emission Unit	P (ton/hr)	E (lb/hr)	Equation Used
Shot blaster	0.15	1.17	$E = 4.10 P^{0.67}$

The fabric filters shall be in operation at all times the shot blaster is in operation, in order to comply with this limit. This is an existing limit and no change has been made in this renewal.

Machining Operation (EU-08)

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

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

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the machining operation shall not exceed 8.24 pounds per hour when operating at a process weight rate of 2.84 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

Summary of Process Weight Rate Limits			
Process / Emission Unit	P (ton/hr)	E (lb/hr)	Equation Used
Machining Operation	2.84	8.24	$E = 4.10 P^{0.67}$

Based on calculations, no controls are needed to comply with this limit. This is a new limit in this renewal.

Natural Gas fired heaters (EU-09)

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

Pursuant to 326 IAC 6-3-2(e)(2), the natural gas-fired heaters, identified as EU-09, are not subject to the requirements of 326 IAC 6-3, since according to 326 IAC 1-2-59 process weight does not include liquid or gases.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

The natural gas-fired heaters, identified as EU-09, are not subject to 326 IAC 326 IAC 7-1.1 because they have a potential to emit (or limited potential to emit) sulfur dioxide (SO₂) of less than 25 tons per year or 10 pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Even though, the natural gas-fired combustion heaters, were constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6, because their unlimited VOC potential emissions are less than twenty-five (25) tons per year.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

The requirements of 326 IAC 9-1 do not apply to the natural gas-fired heaters because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)

The requirements of 326 IAC 10-3 do not apply to the natural gas-fired heaters since these units are not blast furnace gas-fired boilers, Portland cement kilns, or is a facility specifically listed under 326 IAC 10-3-1(a)(2).

Compliance Determination and Monitoring Requirements

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

Control Device/ Emission Unit	Type of Parametric Monitoring	Frequency	Range or Specification
Fabric Filters/ Shot blaster	Fabric Filter Inspections	Semi-annual	Verify that it is operated and maintained per manufacturer's specifications

These monitoring conditions are necessary because the Fabric Filters for the Shot blaster must operate properly to assure compliance with 326 IAC 6-3-2. Visible Emissions are not required since the shot blaster exhausts indoors.

This is a new requirement made in this renewal.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on May 26, 2020.

The operation of this stationary plastic parts manufacturer shall be subject to the conditions of the attached proposed MSOP Renewal No. 143-42892-00021.

The staff recommends to the Commissioner that the MSOP Renewal be approved.

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Nicholas Walters, 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) 234-9513 or (800) 451-6027, and ask for Nicholas Walters or (317) 234-9513.
- (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 Summary

Company Name: American Plastic Molding
Source Address: 965 S. Elm St, Scottsburg, IN 47170
Permit Number: 143-42892-00021
Reviewer: Nicholas Walters

Unlimited PTE										
Emission Category	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPS	Worst Single HAP	
Closed Injection Molding (EU-01)	1.89	1.89	1.89	-	-	4.97	2.74	1.86	1.53	Styrene
Grinding Station (EU-02)	3.07	3.07	3.07	-	-	-	-	-	-	-
Material Transfer (EU-03)	2.77	2.77	2.77	-	-	-	-	-	-	-
Assembly Area (EU-04)	-	-	-	-	-	0.14	-	5.67E-07	5.67E-07	Xylene
Maintenance Manual Welding Stations (EU-05)	0.10	0.10	0.10	-	-	-	-	6.31E-03	6.27E-03	Manganese
Maintenance Parts Washers (EU-06)	-	-	-	-	-	0.78	-	-	-	-
Shot Blaster (EU-07)	13.53	13.53	13.53	-	-	-	-	-	-	-
Machining Operation (EU-08)	211.09	21.11	21.11	-	-	-	-	-	-	-
Natural Gas Heaters (EU-09)	0.02	0.08	0.08	0.01	1.05	0.06	0.88	1.97E-02	1.88E-02	Hexane
Paved Roads	0.12	0.02	0.01	-	-	-	-	-	-	-
Unpaved Roads	3.47	0.93	0.09	-	-	-	-	-	-	-
Total	236.08	43.51	42.66	0.01	1.05	5.94	3.61	1.88	1.53	Styrene

Appendix A: HAP Summary

Company Name: American Plastic Molding
Source Address: 965 S. Elm St, Scottsburg, IN 47170
Permit Number: 143-42892-00021
Reviewer: Nicholas Walters

HAPs	CAS #	Mold Machines	Solvent Usage	Maintenance Welding	Natural Gas Heaters	Total
Benzene	71-43-2	-	-	-	2.19E-05	2.19E-05
Dichlorobenzene	106-46-7	-	-	-	1.25E-05	1.25E-05
Formaldehyde	50-00-0	1.73E-02	-	-	7.84E-04	1.81E-02
Hexane	110-54-3	-	-	-	1.88E-02	1.88E-02
Toluene	108-05-3	-	-	-	3.55E-05	3.55E-05
Lead	7439-92-1	-	-	-	5.23E-06	5.23E-06
Cadmium	7440-43-9	-	-	-	1.15E-05	1.15E-05
Manganese	7439-96-5	-	-	6.27E-03	3.97E-06	6.27E-03
Nickel	7440-02-0	-	-	1.97E-05	2.19E-05	4.17E-05
Chromium	7440-47-3	-	-	1.97E-05	1.46E-05	3.43E-05
xylene	1330-20-7	-	5.67E-07	-	-	5.67E-07
ethyl benzene	100-41-4	9.71E-02	-	-	-	9.71E-02
Acrolein	107-02-8	6.53E-04	-	-	-	6.53E-04
Acetaldehyde	75-07-0	6.84E-03	-	-	-	6.84E-03
Propionaldehyde	123-38-6	9.29E-04	-	-	-	9.29E-04
Styrene	100-42-5	1.53	-	-	-	1.53
Acrylonitrile	75-05-8	9.43E-02	-	-	-	9.43E-02
Acetophenone	98-86-2	1.12E-01	-	-	-	1.12E-01
Cumene	98-82-8	-	3.35E-10	-	-	3.35E-10
Totals		1.86	5.67E-07	6.31E-03	1.97E-02	1.88

Appendix A: Unpermitted Units Summary

Company Name: American Plastic Molding
 Source Address: 965 S. Elm St, Scottsburg, IN 47170
 Permit Number: 143-42892-00021
 Reviewer: Nicholas Walters

Unlimited PTE (tons/year)										
Emission Category	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPS	Worst Single HAP	
Closed Injection Molding (EU-01)	0.92	0.92	0.92	-	-	2.42	1.33	0.90	0.74	Styrene
Grinding Station (EU-02)	0.30	0.30	0.30	-	-	-	-	-	-	-
Machining Operation (EU-08)	70.36	7.04	7.04	-	-	-	-	-	-	-
Total	71.59	8.26	8.26	0.00	0.00	2.42	1.33	0.90	0.74	Styrene

**Appendix A: Emission Calculations
Closed Injection Molding Operation (EU-01)**

**Company Name: American Plastic Molding
Source Address: 965 S. Elm St, Scottsburg, IN 47170
Permit Number: 143-42892-00021
Reviewer: Nicholas Walters**

Resin Type	Percent of Production	Max Throughput Rate (lbs resin/hr)	PM			VOC			CO		
			(1) Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)
ABS ¹	41.15%	2,763.22	65	0.18	0.79	189	0.52	2.29	100	0.28	1.21
PP ²	42.27%	2,838.43	68.4	0.19	0.85	177	0.50	2.20	100	0.28	1.24
Polyamide ³	10.45%	701.72	67	0.05	0.21	137	0.10	0.42	33	0.02	0.10
HDPE ⁴	4.59%	308.22	26.6	0.01	0.04	30.7	0.01	0.04	100	0.03	0.13
LDPE ⁴	1.55%	104.08	30.9	0.00	0.01	35.3	0.00	0.02	100	0.01	0.05
Totals		6,716		0.432	1.893		1.134	4.967		0.625	2.736

Resin Type	Percent of Production	Max Throughput Rate (lbs resin/hr)	Formaldehyde			Acrolein			Acetaldehyde			Propionaldehyde		
			Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)
ABS ¹	41.15%	2,763.22	0	0.0000	0.0000	0	0.0000	0.0000	0	0.0000	0.0000	0	0.0000	0.0000
PP ²	42.27%	2,838.43	1.38	0.0039	0.0172	0.05	0.0001	0.0006	0.54	0.0015	0.0067	0.07	0.0002	0.0009
Polyamide ³	10.45%	701.72	0	0.0000	0.0000	0	0.0000	0.0000	0	0.0000	0.0000	0	0.0000	0.0000
HDPE ⁴	4.59%	308.22	0.06	0.0000	0.0001	0.02	0.0000	0.0000	0.05	0.0000	0.0001	0.02	0.0000	0.0000
LDPE ⁴	1.55%	104.08	0.1	0.0000	0.0000	0.01	0.0000	0.0000	0.12	0.0000	0.0001	0.07	0.0000	0.0000
Totals		6,716		0.004	0.017		0.000	0.001		0.002	0.007		0.000	0.001

Resin Type	Percent of Production	Max Throughput Rate (lbs resin/hr)	Ethyl Benzene			Styrene			Acrylonitrile			Acetophenone		
			Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)
ABS ¹	41.15%	2,763.22	8.02	0.0222	0.0971	126	0.3482	1.5250	7.79	0.0215	0.0943	9.29	0.0257	0.1124
PP ²	42.27%	2,838.43	0	0.0000	0.0000	0	0.0000	0.0000	0	0.0000	0.0000	0	0.0000	0.0000
Polyamide ³	10.45%	701.72	0	0.0000	0.0000	0.32	0.0002	0.0010	0	0.0000	0.0000	0	0.0000	0.0000
HDPE ⁴	4.59%	308.22	0	0.0000	0.0000	0	0.0000	0.0000	0	0.0000	0.0000	0	0.0000	0.0000
LDPE ⁴	1.55%	104.08	0	0.0000	0.0000	0	0.0000	0.0000	0	0.0000	0.0000	0	0.0000	0.0000
Totals		6,716		0.022	0.097		0.348	1.526		0.022	0.094		0.026	0.112
												TOTAL HAP	0.424	1.855
												Single Worst	0.348	1.526

Notes and Methodology

- (1) ABS emission factor for PM taken from general molding emissions from Emission Calculation Fact Sheet, Plastic Production and Products Manufacturing, Michigan Department of Environmental Quality, Fact Sheet #9847, November, 2005. ABS emission factors for VOC and HAPs taken from: "Sampling and Analysis of Volatile Organic Compounds Evolved During Thermal Processing of ABS Composite Resins", Journal of Air & Waste Management, Volume 45, January 1995.
- (2) Polypropylene emission factors for PM, VOC and HAPs from Polypropylene molding were taken from a technical paper, volume 49 in January 1999, published by the Journal of Air and Waste Management Association titled "Development of Emission Factors for Polypropylene Processing".
- (3) Polyamide - Nylon emission factors for Polyamide resins were obtained from a technical paper published by AWMA in volume 51 in July 2001 titled "Development of Emission Factors for Polyamide Processing".
- (4) Polyethylene emission factors obtained from a technical paper published by AWMA in volume 46 in June 1996 titled "Development of Emission Factors for Polyethylene Processing" (HDPE@430F and LDPE@500F)

**Appendix A: Emission Calculations
Closed Injections Molding Operation (EU-01) - Inventory**

**Company Name: American Plastic Molding
Source Address: 965 S. Elm St, Scottsburg, IN 47170
Permit Number: 143-42892-00021
Reviewer: Nicholas Walters**

Machine No.	Ton	Make	Model Number	Year Installed	Max Injection Rate (lb/hr)
0.5	5.5	Sprite Electric		1999	26
03C	85	Cincinnati-Milacron		1999	55
10A	125	Cincinnati-Milacron	MTS125	2014	125
10B	125	Cincinnati-Milacron	MTS125	2014	125
10C	125	Cincinnati-Milacron	MTS125	2014	125
11	110	Cincinnati-Milacron	ROBO1101-97	2000	43
11B	165	Cincinnati-Milacron	S2000165S178G	2014	95
11C	165	Cincinnati-Milacron	ALPHA 165A178G	2014	95
11D	110	Cincinnati-Milacron	ALPHA S110IA-138G	2016	43
11E	110	Cincinnati-Milacron	ALPHAS110IA138G	2016	43
11F	198	Cincinnati-Milacron	ALPHA S165IA 300	2019	164
12	110	Cincinnati-Milacron	VT-110-5	1997	63
14V	130	Cincinnati-Milacron	MV-130	2016	63
15	120	Cincinnati-Milacron	VV120-7.58	1999	95
16	165	Cincinnati-Milacron	VT-165-7	1997	88
18	165	Cincinnati-Milacron	VT165-11	2000	113
19A	170	Cincinnati-Milacron	MTS-170	2014	164
20	225	Cincinnati-Milacron	MTS-225	2014	158
21	225	Cincinnati-Milacron	MTS-225	2014	158
22	250	Cincinnati-Milacron	MTS-250	2016	180
23	220	Cincinnati-Milacron	220-VT-32	1995	170
26	225	Cincinnati-Milacron	MTS-225	2016	158
27	225	Cincinnati-Milacron	MTS-225	2016	158
29	220	Cincinnati-Milacron	VT-220-20	1998	160
32	310	Cincinnati-Milacron	MT310-36WP	2003	146
33	310	Cincinnati-Milacron	MT310-25	2005	180
34	310	Cincinnati-Milacron	MTS-310	2014	135
35	310	Cincinnati-Milacron	MTS-310	2014	135
36	310	Cincinnati-Milacron	MTS-310	2015	135
42	450	Cincinnati-Milacron	MM450-76	2005	105
43	400	Cincinnati-Milacron	NTS-400	2018	270
45	400	Cincinnati-Milacron	MH400-54	1999	270
48	450	Cincinnati-Milacron	MS-450	2015	105
51	500	Cincinnati-Milacron	MH500-54	1999	236
53	580	Cincinnati-Milacron	MS-580	2015	380
54	500	Cincinnati-Milacron	MTS-500	2018	225
57	500	Cincinnati-Milacron	MTS-500	2018	225
63	600	Cincinnati-Milacron	MPS-600	2016	319
64	600	Cincinnati-Milacron	MPS-600	2017	319
65	610	Cincinnati-Milacron	MTS-610-60	2018	225
71	725	Cincinnati-Milacron	MM725-85	2002	319
72	720	Cincinnati-Milacron	MM725-85	2003	319
Total					6,715 lb/hr
Total	Potential				58,823,400 lb/year

326 IAC 6-3-2 Limitation	
Max Process Weight: 380	
P (ton/hr)	E (lb/hr)
0.19	1.347562042

Appendix A: Unpermitted Units for Injection Molding - EU-01

Company Name: American Plastic Molding
 Source Address: 965 S. Elm St, Scottsburg, IN 47170
 Permit Number: 143-42892-00021
 Reviewer: Nicholas Walters

New Units added in per						
Machine No.	Ton	Make	Model Number	Year Installed	Max Injection Rate (lb/hr)	
10C	125	Cincinnati	MTS-125	2014	125	
11D	110	Cincinnati	ALPHA S1	2016	43	
11E	110	Cincinnati	ALPHA S1	2016	43	
11F	198	Cincinnati	ALPHA S1	2019	164	
14V	130	Cincinnati	MV-130	2016	63	
20	225	Cincinnati	MTS-225	2014	158	
21	225	Cincinnati	MTS-225	2014	158	
26	225	Cincinnati	MTS-225	2016	158	
27	225	Cincinnati	MTS-225	2016	158	
36	310	Cincinnati	MTS-310	2015	135	
43	400	Cincinnati	NTS-400	2018	270	
48	450	Cincinnati	MS-450	2015	105	
53	580	Cincinnati	MS-580	2015	380	
54	500	Cincinnati	MTS-500	2018	225	
57	500	Cincinnati	MTS-500	2018	225	
63	600	Cincinnati	MPS-600	2016	319	
64	600	Cincinnati	MPS-600	2017	319	
65	610	Cincinnati	MTS-610	2018	225	
Total					3,273	
Total	Ton per year					28,671,480

Resin Type	Percent of Production	Max Throughput Rate (lbs resin/hr)	PM			VOC			CO		
			Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)
ABS ¹	41.15%	1,346.84	65	0.09	0.38	189	0.25	1.11	100	0.13	0.59
PP ²	42.27%	1,383.50	68.4	0.09	0.41	177	0.24	1.07	100	0.14	0.61
Polyamide	10.45%	342.03	67	0.02	0.10	137	0.05	0.21	33	0.01	0.05
HDPE ⁴	4.59%	150.23	26.6	0.00	0.02	30.7	0.00	0.02	100	0.02	0.07
LDPE ⁴	1.55%	50.73	30.9	0.00	0.01	35.3	0.00	0.01	100	0.01	0.02
Totals		3,273		0.211	0.923		0.553	2.421		0.304	1.333

Resin Type	Percent of Production	Max Throughput Rate (lbs resin/hr)	Formaldehyde			Acrolein			Acetaldehyde			Propionaldehyde		
			Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)
ABS ¹	41.15%	1,346.84	0	0.0000	0.0000	0	0.0000	0.0000	0	0.0000	0.0000	0	0.0000	0.0000
PP ²	42.27%	1,383.50	1.38	0.0019	0.0084	0.05	0.0001	0.0003	0.54	0.0007	0.0033	0.07	0.0001	0.0004
Polyamide	10.45%	342.03	0	0.0000	0.0000	0	0.0000	0.0000	0	0.0000	0.0000	0	0.0000	0.0000
HDPE ⁴	4.59%	150.23	0.06	0.0000	0.0000	0.02	0.0000	0.0000	0.05	0.0000	0.0000	0.02	0.0000	0.0000
LDPE ⁴	1.55%	50.73	0.1	0.0000	0.0000	0.01	0.0000	0.0000	0.12	0.0000	0.0000	0.07	0.0000	0.0000
Totals		3,273		0.002	0.008		0.000	0.000		0.001	0.003		0.000	0.000

Resin Type	Percent of Production	Max Throughput Rate (lbs resin/hr)	Ethyl Benzene			Styrene			Acrylonitrile			Acetophenone		
			Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)	Emission Factor (lbs/10 ⁶ lbs)	Emissions (lbs/hr)	Emissions (tons/yr)
ABS ¹	41.15%	1,346.84	8.02	0.0108	0.0473	126	0.1697	0.7433	7.79	0.0105	0.0460	9.29	0.0125	0.0548
PP ²	42.27%	1,383.50	0	0.0000	0.0000	0	0.0000	0.0000	0	0.0000	0.0000	0	0.0000	0.0000
Polyamide	10.45%	342.03	0	0.0000	0.0000	0.32	0.0001	0.0005	0	0.0000	0.0000	0	0.0000	0.0000
HDPE ⁴	4.59%	150.23	0	0.0000	0.0000	0	0.0000	0.0000	0	0.0000	0.0000	0	0.0000	0.0000
LDPE ⁴	1.55%	50.73	0	0.0000	0.0000	0	0.0000	0.0000	0	0.0000	0.0000	0	0.0000	0.0000
Totals		3,273		0.011	0.047		0.170	0.744		0.010	0.046		0.013	0.055
TOTAL HAP													0.206	0.904
Single Worst													0.170	0.744

**Emission Calculations Summary
Grinding Station (EU-02)**

Company Name: American Plastic Molding
Source Address: 965 S. Elm St, Scottsburg, IN 47170
Permit Number: 143-42892-00021
Reviewer: Nicholas Walters

Machine No.	Description	Model Number	Year Installed	HP	Throughput (lb/hr)	Emission Factor for PM (lbs/ton)	PM (lb/hr)	PM PTE (tpy)
GR-01	Nelmor	G1012M1	1983	7.5	450	0.06	0.014	0.059
GR-02	Wortex	JC-5	1990	5	500	0.06	0.015	0.066
GR-03	Nelmor	RBP27	2006	20	500	0.06	0.015	0.066
GR-04	Grinder	MP-712	1994	5	200	0.06	0.006	0.026
GR-05	Nelmor	RG12295	2006	15	425	0.06	0.013	0.056
GR-06	Conair	CR-614	1998	5	120	0.06	0.004	0.016
GR-07	Rapid	611-SR	1995	3	150	0.06	0.005	0.020
GR-08	Polymer Systems	912STL	1994	15	500	0.06	0.015	0.066
GR-09	Rapid	1528	1995	3	150	0.06	0.005	0.020
GR-10	Nelmor	RG1224P1		15	425	0.06	0.013	0.056
GR-11	Wortex	JC-5L	1985	7.5	500	0.06	0.015	0.066
GR-12	Conair	LP-350		3	150	0.06	0.005	0.020
GR-13	Conair Wortex	JC-10	1984	10	900	0.06	0.027	0.118
GR-14	Conair Wortex	JC-10L	1990	10	900	0.06	0.027	0.118
GR-15	Conair Wortex	JC-10L	1987	10	900	0.06	0.027	0.118
GR-16	Conair	CR614	2012	5	120	0.06	0.004	0.016
GR-17	Conair Martin	LP-350	1995	3	150	0.06	0.005	0.020
GR-18	Wortex	JC-5	1985	5	500	0.06	0.015	0.066
GR-19	Wortex	JC-5L	1983	7.5	500	0.06	0.015	0.066
GR-20	Conair Wortex	JC-5L	1990	7.5	500	0.06	0.015	0.066
GR-21	Wortex	JC-5	1986	5	500	0.06	0.015	0.066
GR-22	Wortex	JC-10	1981	10	900	0.06	0.027	0.118
GR-23	Nelmar	GP1220P	2015	15	500	0.06	0.015	0.066
GR-25	Conair Wortex	JC-5LA	1983	7.5	500	0.06	0.015	0.066
GR-26	Conair Wortex	614-SRE	2001	3	120	0.06	0.004	0.016
GR-27	Conair Wortex	JC-5L	1982	5	500	0.06	0.015	0.066
GR-28	Wortex	JC-5L	1982	5	500	0.06	0.015	0.066
GR-29	Wortex	JC-10	1981	10	900	0.06	0.027	0.118
GR-30	Conair Wortex	JC-10	1988	10	900	0.06	0.027	0.118
GR-31	Conair Wortex	JC-5L	1982	7.5	500	0.06	0.015	0.066
GR-32	Conair Wortex	JC-5LA	1983	7.5	500	0.06	0.015	0.066
GR-33	Rapid	611-SR	1994	3	150	0.06	0.005	0.020
GR-35	Conair Wortex	JC-5LA	1983	7.5	500	0.06	0.015	0.066
GR-38	Rapid	611-SR	2000	3	150	0.06	0.005	0.020
GR-39	Conair Wortex	JC-10L	1994	10	900	0.06	0.027	0.118
GR-40	Nelmor	G1012M1	1985	10	450	0.06	0.014	0.059
GR-41	Nelmor	G12RG11	1985	7.5	500	0.06	0.015	0.066
GR-42	Conair Wortex	LP-350	2005	3	200	0.06	0.006	0.026
GR-43	Wortex	JC-5L	1989	5	500	0.06	0.015	0.066
GR-44	Cincinnati Milacron	CM0912	1993	7.5	500	0.06	0.015	0.066
GR-47	Rapid	69-SR	1998	3	150	0.06	0.005	0.020
GR-48	Rapid	611-SR	1998	5	150	0.06	0.005	0.020
GR-49	Rapid	614-SRE	1998	3	150	0.06	0.005	0.020
GR-50	Rapid	814	1998	5	150	0.06	0.005	0.020
GR-51	Wortex	JC-10L	1988	15	900	0.06	0.027	0.118
GR-52	Conair	CR-617	1998	5	140	0.06	0.004	0.018
GR-53	Conair	CR-617	1995	5	140	0.06	0.004	0.018
GR-54	Conair	NCR 69	2007	5	80	0.06	0.002	0.011
GR-55	Nelmor	G1220M1	2014	20	500	0.06	0.015	0.066
GR-60	Nelmor	GP1012P1	1995	5	300	0.06	0.009	0.039
GR-61	Nelmor	G1215P1	1993	10	400	0.06	0.012	0.053
GR-62	Nelmor	G1012P1	1994	7.5	300	0.06	0.009	0.039
GR-73	Polymer Systems	1116SPL	1993	15	500	0.06	0.015	0.066
GR-74	AEC	G2024TF	2019	30	800	0.06	0.024	0.105
Total					23,370		0.701	3.07

326 IAC 6-3-2 Limitation	
Max Process Weight: 900	
P (ton/hr)	E (lb/hr)
0.45	2.401243714

**Emission Calculations Summary
Unpermitted Granulators - Grinding Station (EU-02)**

Company Name: American Plastic Molding
Source Address: 965 S. Elm St, Scottsburg, IN 47170
Permit Number: 143-42892-00021
Reviewer: Nicholas Walters

New Units								
Machine No	Description	Model Number	Year Installed	HP	Throughput (lb/hr)	PM Emission Factor for PM (lbs/ton)	PM (lb/hr)	PM PTE (tpy)
GR-23	Nelmar	GP1220P	2015	15	500	0.06	0.015	0.066
GR-60	Nelmor	GP1012P1	1995	5	300	0.06	0.009	0.039
GR-61	Nelmor	G1215P1	1993	10	400	0.06	0.012	0.053
GR-62	Nelmor	G1012P1	1994	7.5	300	0.06	0.009	0.039
GR-74	AEC	G2024TF	2019	30	800	0.06	0.024	0.105
Total					2,300		0.069	0.30

**Appendix A: Emission Calculations
Material Transfer System (EU-03)**

**Company Name: American Plastic Molding
Source Address: 965 S. Elm St, Scottsburg, IN 47170
Permit Number: 143-42892-00021
Reviewer: Nicholas Walters**

Handling Point	Type of Material Handled	Max Rate (lb/hr)	Emission Factor (lbs/ton)	Potential PM Emissions (tons/yr)	Control Efficiency (%)	Controlled PM Emissions (tons/yr)
Raw Material Silo Loading	Polypropylene Pellets	6,335	0.19	2.64	0%	2.64
Material Transfer and Gaylord Loadout Station	Polypropylene Pellets	6,335	0.19	2.64	95%	0.13
		12,670		5.27		2.77

Notes

Emission factor for conveyance of pellets is based on AP-42 Chapter 8.2 Table 8.2-1 for urea bagging.

Methodology

$PTE \text{ (tons/year)} = \text{Maximum Rate (lbs/hr)} \times (1 \text{ ton}/2000 \text{ lbs}) \times \text{Emission Factor (lbs/ton)} \times 8760 \text{ (hours/year)} \times (1 \text{ ton}/2000 \text{ lbs})$

$\text{Controlled Emissions (tons/year)} = PTE \times (1 - \text{Control Eff})$

326 IAC 6-3-2 Limitation	
P (ton/hr)	E (lb/hr)
6.335	14.12388236

**Appendix A: Emission Calculations
Assembly Area (EU-04)**

**Company Name: American Plastic Molding
Source Address: 965 S. Elm St, Scottsburg, IN 47170
Permit Number: 143-42892-00021
Reviewer: Nicholas Walters**

Inventory Number	Description	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	Annualized Highest Month	Amount Per gal	VOC lb/gal	VOC lb per item	VOC (tpy)	Xylene (tpy)	Cumene (tpy)
A0262	Stella Loctite 271 50ml	0	3	4	4	2	5	5	5	3	6	3	13	53	156	0.013	0.065	0.001	0.000	0	3.35E-10
A0441	Loctite 411 - 20g	0	0	2	1	0	1	1	1	4	1	4	1	16	48	0.005	0.167	0.001	0.000	0	0
	Ink (1 Quart)	0	6	0	0	0	6	0	0	0	0	0	3	15	72	0.250	5.004	1.25	0.045	0	0
D0014	Ink Thinner (1 Quart)	0	2	0	0	0	2	0	0	0	0	0	1	5	24	0.250	7.560	1.89	0.023	0.000000567	0
D0027	ABS Glue #4707 (1 QT est.)	0	11	5	8	2	6	9	7	5	8	5	18	84	216	0.250	2.710	0.68	0.073	0	0
Total																			0.141	5.67E-07	3.35E-10

Notes: Solvent usage estimated using highest monthly material requisitions for 2019 and multiplying by 12 months.
Ink usage was estimated assuming 3 to 1 use of ink to thinner. VOC content for ink calculated. Specific Gravity of ink is 1.0 volatility is 40 to 60%

Total HAPS	5.67E-07
Single Worst	5.67E-07

**Appendix A: Emission Calculations
Maintenance Manual Welding Stations (EU-05)**

**Company Name: American Plastic Molding
Address, City, State, ZIP: 965 S. Elm St, Scottsburg, IN 47170
Permit Number: 143-42892-00021
Permit Reviewer: Nicholas Walters**

Class	Name	EF Group	2014	
			Usage	Percentage
ABS	ABS	ABS	447,447	11.86%
ACE	Acetal	PP	83,125	2.20%
ACR	Acrylic	ABS	82,289	2.18%
EHD	Polyethylene - High Density	HDPE	172,971	4.59%
NAS		ABS	115,419	3.06%
Nylons	Polyamides	Polyamide	394,050	10.45%
PBT	Polyester	LDPE	55,957	1.48%
PET	Polyester	LDPE	2,446	0.06%
PCA	Polycarbonate alloy	ABS	103,302	2.74%
PCB	Polycarbonate	ABS	240,273	6.37%
PP	Polypropylene	PP	1,362,336	36.11%
PPO	Polyphenylene Oxide	ABS	6,691	0.18%
PPS	Polyphenylene Sulfide	ABS	114	0.00%
PSH	High Impact Polystyrene	ABS	406,618	10.78%
SAN	Styrene Acrylonitrile	ABS	143,567	3.81%
SBC	Styrene Butadiene Copolymer	ABS	6,535	0.17%
TPE	Thermoplastic Elastomer	PP	45,433	1.20%
TPO	Thermoplastic Olefin	PP	51,207	1.36%
TPR	Thermoplastic Rubber	PP	0	0.00%
TPU	Thermoplastic Urethane	PP	52,650	1.40%
Total			3,772,430	100.00%

Class	Usage	Percentage
ABS	1,552,255	41.15%
PP	1,594,751	42.27%
HDPE	172,971	4.59%
Polyamide	394,050	10.45%
LDPE	58,403	1.55%
Total	3,772,430	100.00%

**Appendix A: Emission Calculations
Maintenance Manual Welding Stations (EU-05) and Maintenance Parts Washers (EU-06)**

**Company Name: American Plastic Molding
Company Address: 965 S. Elm St, Scottsburg, IN 47170
Address : Number: 143-42892-00021
Reviewer: Nicholas Walters**

Welding Emissions Estimate for EU-05

WELDING Area	Max. electrode consumption		EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)				PTE ton/yr	HAPS (lbs/hr)	HAPS (ton/yr)
	Actual (lb/yr)	Maximum (lb/hr)	Potential (lb/yr)	PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	PM		
Maintenance	33	2.25	19710	0.0052	0.000318	0.000001	0.000001	1.17E-02	7.16E-04	2.25E-06	2.25E-06	5.12E-02	7.20E-04	3.15E-03
Mold Shop	1	2.25	19710	0.0052	0.000318	0.000001	0.000001	1.17E-02	7.16E-04	2.25E-06	2.25E-06	5.12E-02	7.20E-04	3.15E-03
Total								2.34E-02	1.43E-03	4.50E-06	4.50E-06	1.02E-01	1.44E-03	6.31E-03
								Total ton/yr	6.27E-03	1.97E-05	1.97E-05			
								Single Worst	6.27E-03	Mn				

* Emission Factors from AP-42 Table 12.19-1 and Table 12.19-2.
Estimated maximum electrode consumption taken from, Welding and Cutting: Instructions and Care and Use of Oxy-Acetylene Apparatus and Equipment,
Fred E. Rogers, Davis-Bournonville Company, Jersey City, NY, 1921.

Degreaser Emissions Estimate for EU-06

Emission Unit	Maximum Annual Solvent Usage (gal/yr)	Solvent Density (lbs/gal)	Volatile Content (%)	VOC Potential (tpy)
2 small parts washers	240	6.5	100%	0.78

Description

The facility has 2 parts washers of 30 gallon capacity each that use Chemsearch VOLTZ II Solvent.
One in Maintenance area, one in Southern Mold and Tool

Methodology

Maximum Annual Solvent Usage (gal/yr) = assumed that each parts washer's solvent is lost during quarterly service.

VOC Potential (tpy) = Maximum Annual Solvent Usage (gal/yr) * Solvent Density (lbs/gal) * Volatile Content (%) / 2,000 lbs per ton

No HAPS in VOLTZ II solvent

**Appendix A: Emission Calculations
Shot Blaster (EU-07) - Confined**

Company Name: American Plastic Molding
Source Address: 965 S. Elm St, Scottsburg, IN 47170
Permit Number: 143-42892-00021
Reviewer: Nicholas Walters

Shot Blaster - Cyclone Blasting Systems Model No. 4826
1/4" Nozzle
Gun Pressure 90-100 psi
Blast Medium - Glass Bead

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)								
	30	40	50	60	70	80	90	100	
1/8	28	35	42	49	55	63	70	77	
3/16	65	80	94	107	122	135	149	165	
1/4	109	138	168	195	221	255	280	309	
5/16	205	247	292	354	377	420	462	507	
3/8	285	355	417	477	540	600	657	720	
7/16	385	472	560	645	755	820	905	940	
1/2	503	615	725	835	945	1050	1160	1265	
5/8	820	990	1170	1336	1510	1680	1850	2030	
3/4	1140	1420	1670	1915	2160	2400	2630	2880	
1	2030	2460	2900	3340	3780	4200	4640	5060	

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)
 FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =
 D = Density of abrasive (lb/ft3) From Table 2 =
 D1 = Density of sand (lb/ft3) =
 ID = Actual nozzle internal diameter (in) =
 ID1 = Nozzle internal diameter (in) from Table 3 =

309
99
99
0.25
0.25

Flow Rate (FR) (lb/hr) = 309.000 per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =
 FR = Flow Rate (lb/hr) =
 w = fraction of time of wet blasting =
 N = number of nozzles =

0.010
309
0
1

326 IAC 6-3-2 Limitation	
P (ton/hr)	E (lb/hr)
0.1545	1.173183485

Uncontrolled Emissions = 3.09 lb/hr
13.53 ton/yr per cabinet

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs

Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)2 x (D/D1)

E = EF x FR x (1-w/200) x N

w should be entered in as a whole number (if w is 50%, enter 50)

Controlled Emissions = 0.06 lb/hr
0.27 ton/yr per cabinet
 (Based on 98% control for built)

**Appendix A: Emission Calculations
Machining Operation (EU-08)**

Company Name: American Plastic Molding
Source Address: 965 S. Elm St, Scottsburg, IN 47170
Permit Number: 143-42892-00021
Reviewer: Nicholas Walters

Unit	Model	Estimated Maximum Throughput	Control	Throughput (ton/hr)	PM EF (lb/ton)	PM 10 (lb/ton)	Uncontrolled PTE PM (lb/hr)	Controlled PM (lb/hr)	PTE PM (ton/yr)	Actual PM (ton/yr)	Uncontrolled PTE PM 10 (lb/hr)	Controlled PM (lb/hr)	PTE PM 10 (ton/yr)	Actual PM 10 (ton/yr)
CNC Vertical Milling Center	HAAS VF-0	15 lb/hr Throughput (Graphite)	Airflow Systems Inc., 1500 cfm	0.008	17	1.7	0.128	0.013	0.56	0.06	0.013	0.001	0.06	0.01
CNC Vertical Milling Center	HAAS VF-4	15 lb/hr Throughput (Graphite)	Airflow Systems Inc., 1500 cfm	0.008	17	1.7	0.128	0.013	0.56	0.06	0.013	0.001	0.06	0.01
CNC Vertical Milling Center	HAAS VF-4	16 lb/hr Throughput (Graphite)	Airflow Systems Inc., 1500 cfm	0.008	17	1.7	0.128	0.013	0.56	0.06	0.013	0.001	0.06	0.01
CNC Sinker EDM	Charmilles - Form 30	371 lb/hr Throughput Metal	Torit VS1500, 1500 cfm	0.188	17	1.7	3.188	0.319	13.96	1.40	0.319	0.032	1.40	0.14
CNC Sinker EDM	Charmilles - Robo Form 54	372 lb/hr Throughput Metal	Torit VS1500, 1500 cfm	0.188	17	1.7	3.188	0.319	13.96	1.40	0.319	0.032	1.40	0.14
EDM Wire	Accutex - 560SA	373 lb/hr Throughput Metal	Torit VS1500, 1500 cfm	0.188	17	1.7	3.188	0.319	13.96	1.40	0.319	0.032	1.40	0.14
EDM Hole Start	Accutex	374 lb/hr Throughput Metal	Torit VS1500, 1500 cfm	0.188	17	1.7	3.188	0.319	13.96	1.40	0.319	0.032	1.40	0.14
Vertical Milling Machine	Bridgeport Series I 2-J	375 lb/hr Throughput Metal	Torit VS1500, 1500 cfm	0.188	17	1.7	3.188	0.319	13.96	1.40	0.319	0.032	1.40	0.14
Vertical Milling Machine	Chevalier	375 lb/hr Throughput Metal	Torit VS1500, 1500 cfm	0.188	17	1.7	3.188	0.319	13.96	1.40	0.319	0.032	1.40	0.14
Radial Drill		375 lb/hr Throughput Metal	Torit VS1500, 1500 cfm	0.188	17	1.7	3.188	0.319	13.96	1.40	0.319	0.032	1.40	0.14
Surface Grinder	Okamoto	375 lb/hr Throughput Metal	Torit VS1500, 1500 cfm	0.188	17	1.7	3.188	0.319	13.96	1.40	0.319	0.032	1.40	0.14
Surface Grinder	Acer	375 lb/hr Throughput Metal	Torit VS1500, 1500 cfm	0.188	17	1.7	3.188	0.319	13.96	1.40	0.319	0.032	1.40	0.14
Surface Grinder	Chevalier	375 lb/hr Throughput Metal	Torit VS1500, 1500 cfm	0.188	17	1.7	3.188	0.319	13.96	1.40	0.319	0.032	1.40	0.14
Surface Grinder	Chevalier	375 lb/hr Throughput Metal	Torit VS1500, 1500 cfm	0.188	17	1.7	3.188	0.319	13.96	1.40	0.319	0.032	1.40	0.14
Surface Grinder Automatic Wet	Chevalier	375 lb/hr Throughput Metal	Torit VS1500, 1500 cfm	0.188	17	1.7	3.188	0.319	13.96	1.40	0.319	0.032	1.40	0.14
CNC Tool Room Lathe	HAAS TLJ	375 lb/hr Throughput Metal	Torit VS1500, 1500 cfm	0.188	17	1.7	3.188	0.319	13.96	1.40	0.319	0.032	1.40	0.14
Lathe	Clausing	375 lb/hr Throughput Metal	Torit VS1500, 1500 cfm	0.188	17	1.7	3.188	0.319	13.96	1.40	0.319	0.032	1.40	0.14
Vertical Contour Saw	Journeyman	375 lb/hr Throughput Metal	Torit VS1500, 1500 cfm	0.188	17	1.7	3.188	0.319	13.96	1.40	0.319	0.032	1.40	0.14
Total				2.835			48.195	4.820	211.1	21.109	4.820	0.482	21.11	2.11

Note: Grinding Emission Factors AIRS emission factors (SCC 3090340)
17 lb PM/ton metal processed
1.7 lb PM10/ton metal processed

326 IAC 6-3-2 Limitation	
P (ton/hr)	E (lb/hr)
2.835	8.241275055

Shaded cells indicate unpermitted emissions units.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: American Plastic Molding
Source Address: 965 S. Elm St, Scottsburg, IN 47170
Permit Number: 143-42892-00021
Reviewer: Nicholas Walters

Description	MMBTU/hr
E-Bay	0.20
D-Bay	0.12
C-Bay 1	0.20
C-Bay 2	0.15
A-Bay 1	0.15
A-Bay 2	0.08
Warehouse 1	0.20
Warehouse 2	0.20
Warehouse 3	0.20
Production	0.40
Office 1	0.13
Office 2	0.13
Office 3	0.14
Office 4	0.14
TOTAL	2.43

Heat Input Capacity MMBTu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
2.4	1020	20.9

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.02	0.08	0.08	0.01	**see below	0.06	0.88

*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)

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	2.2E-05	1.3E-05	7.8E-04	0.02	3.6E-05	0.02

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	5.2E-06	1.1E-05	1.5E-05	4.0E-06	2.2E-05	5.7E-05
					Total HAPs	0.02
					Worst HAP	0.02

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads**

**Company Name: American Plastic Molding
Source Address: 965 S. Elm St, Scottsburg, IN 47170
Permit Number: 143-42892-00021
Reviewer: Nicholas Walters**

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	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)
Vehicle (entering plant) (one-way trip)	40.0	1.0	40.0	2.0	80.0	300	0.057	2.3	829.5
Vehicle (leaving plant) (one-way trip)	40.0	1.0	40.0	2.0	80.0	300	0.057	2.3	829.5
Trucks (entering plant) (one-way trip)	10.0	1.0	10.0	40.0	400.0	300	0.057	0.6	207.4
Trucks (leaving plant) (one-way trip)	10.0	1.0	10.0	40.0	400.0	300	0.057	0.6	207.4
Totals			100.0		960.0			5.7	2073.9

Average Vehicle Weight Per Trip =

9.6	tons/trip
-----	-----------

Average Miles Per Trip =

0.06	miles/trip
------	------------

Unmitigated Emission Factor, Ef = $k \cdot [(s/12)^a] \cdot [(W/3)^b]$ (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 =	9.6	9.6	9.6	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 = $E \cdot [(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, Eext = $E \cdot [(365 - P)/365]$

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 =	5.09	1.36	0.14	lb/mile
Mitigated Emission Factor, Eext =	3.35	0.89	0.09	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Mitigated PTE of PM (Before Control) (tons/yr)	Mitigated PTE of PM10 (Before Control) (tons/yr)	Mitigated PTE of PM2.5 (Before Control) (tons/yr)	Mitigated PTE of PM (After Control) (tons/yr)	Mitigated PTE of PM10 (After Control) (tons/yr)	Mitigated PTE of PM2.5 (After Control) (tons/yr)
Vehicle (entering plant) (one-way trip)	1.39	0.37	0.04	0.69	0.19	0.02
Vehicle (leaving plant) (one-way trip)	1.39	0.37	0.04	0.69	0.19	0.02
Trucks (entering plant) (one-way trip)	0.35	0.09	0.01	0.17	0.05	0.00
Trucks (leaving plant) (one-way trip)	0.35	0.09	0.01	0.17	0.05	0.00
Totals	3.47	0.93	0.09	1.74	0.46	0.05

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight of Loaded Vehicle (tons/trip)] * [Maximum trips per 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 (miles/day)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per year (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
 Mitigated PTE (Before Control) (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Mitigated PTE (After Control) (tons/yr) = (Mitigated PTE (Before Control) (tons/yr)) * (1 - Dust Control Efficiency)

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: American Plastic Molding
Source Address: 965 S. Elm St, Scottsburg, IN 47170
Permit Number: 143-42892-00021
Reviewer: Nicholas Walters**

Paved Roads at Industrial Site

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

Vehicle Information (provided by source)

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)
Vehicle (entering plant) (one-way trip)	55.0	1.0	55.0	2.0	110.0	200	0.038	2.1	760.4
Vehicle (leaving plant) (one-way trip)	55.0	1.0	55.0	2.0	110.0	200	0.038	2.1	760.4
Totals			110.0		220.0			4.2	1520.8

Average Vehicle Weight Per Trip =

2.0

 tons/trip
Average Miles Per Trip =

0.04

 miles/trip

Unmitigated Emission Factor, $E_f = [k \cdot (sL)^{0.91} \cdot (W)^{1.02}]$ (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 =	2.0	2.0	2.0	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, $E_{ext} = E_f \cdot [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, $E_{ext} = E_f \cdot [1 - (p/4N)]$
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, $E_f =$	0.176	0.035	0.0087	lb/mile
Mitigated Emission Factor, $E_{ext} =$	0.161	0.032	0.0079	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Mitigated PTE of PM (Before Control) (tons/yr)	Mitigated PTE of PM10 (Before Control) (tons/yr)	Mitigated PTE of PM2.5 (Before Control) (tons/yr)	Mitigated PTE of PM (After Control) (tons/yr)	Mitigated PTE of PM10 (After Control) (tons/yr)	Mitigated PTE of PM2.5 (After Control) (tons/yr)
Vehicle (entering plant) (one-way trip)	0.06	0.01	0.00	0.03	0.01	0.00
Vehicle (leaving plant) (one-way trip)	0.06	0.01	0.00	0.03	0.01	0.00
Totals	0.12	0.02	0.01	0.06	0.01	0.00

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight of Loaded Vehicle (tons/trip)] * [Maximum trips per 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 year (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 (Before Control) (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (After Control) (tons/yr) = [Mitigated PTE (Before Control) (tons/yr)] * [1 - Dust Control Efficiency]

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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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

October 5, 2020

Joyce Walker
American Plastic Molding
965 S Elm St
Scottsburg IN 47170

Re: Public Notice
American Plastic Molding
Permit Level: MSOP Renewal
Permit Number: 143-42892-00021

Dear Joyce Walker:

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 42892

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 Scott County Public Library - Scottsburg, 108 S Main St, Scottsburg IN 47170-1892. 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 Nicholas Walters, 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 4-9513 or dial (317) 234-9513.

Sincerely,

L. Pogost

L. Pogost
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

October 5, 2020

To: Scott County Public Library - Scottsburg 108 S Main St Scottsburg IN 47170

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: American Plastic Molding
Permit Number: 143-42892-00021

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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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Notice of Public Comment

October 5, 2020
American Plastic Molding
143-42892-00021

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

Mail Code 61-53

IDEM Staff	LPOGOST 10/5/2020 American Plastic Molding 143-42892-00021 (draft/)		Type of Mail: CERTIFICATE OF MAILING ONLY	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		

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		Joyce Walker Manager American Plastic Molding 965 S Elm St Scottsburg IN 471702173 (SOURCE CONTACT CAATS)										
2		Scott County Health Department 1296 N. Gardner St Scottsburg IN 47170-1400 (Health Department)										
3		Scottsburg City Council and Mayors Office 2 E. McLain Street Scottsburg IN 47170 (Local Official)										
4		Scott County Public Library - Scottsburg 108 S Main St Scottsburg IN 47170-1892 (Library)										
5		Scott County Commissioners 1 E. McClain Ave., County Courthouse Scottsburg IN 47170 (Local Official)										
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