NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a Significant Revision to a Federally Enforceable State Operating Permit (FESOP) for Poly-Wood, LLC in Kosciusko County

Significant Permit Revision No.: 085-43740-00132

The Indiana Department of Environmental Management (IDEM) has received an application from Poly-Wood, LLC, located at 1001 W. Brooklyn St., Syracuse, Indiana 46567, for a significant revision of its FESOP issued on February 7, 2020. If approved by IDEM’s Office of Air Quality (OAQ), this proposed revision would allow Poly-Wood, LLC to make certain changes at its existing source. Poly-Wood, LLC, has applied to construct new equipment.

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

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

Syracuse-Turkey Creek Township Public Library
115 E Main Street
Syracuse, Indiana 46567

and

IDEM Northern Regional Office
300 North Dr. Martin Luther King Jr. Boulevard, Suite 450
South Bend, IN 46601-1295

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

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

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.
You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR No.: 085-43740-00132 in all correspondence.

**Comments should be sent to:**

Aida DeGuzman  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Aida DeGuzman or (317) 233-4972  
Or dial directly: (317) 233-4972  
Fax: (317) 232-6749 attn: Aida DeGuzman  
E-mail: adeguzma@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: [https://www.in.gov/idem/airpermit/2358.htm](https://www.in.gov/idem/airpermit/2358.htm); and the Citizens' Guide to IDEM on the Internet at: [https://www.in.gov/idem/6900.htm](https://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, the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

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

Josiah K. Balogun, Section Chief  
Permits Branch  
Office of Air Quality
Mr. Jeremy Dreier  
Poly-Wood, LLC  
1001 W. Brooklyn, Street  
Syracuse, Indiana 46567

Re: 085-43740-00132  
Significant Revision to  
F 085-41789-00132

Dear Mr. Dreier:

Poly-Wood, LLC was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F085-41789-00132, on February 7, 2020, for a stationary household furniture manufacturing facility located at 1001 W. Brooklyn St., Syracuse, Indiana 46567. On February 8, 2021, the Office of Air Quality (OAQ) received an application from the source requesting to construct new equipment. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

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

New plastic extruders for construction at existing Building 7:

(a) Twenty-four (24) plastic extruders, identified as Extruders 35 through 58, approved in 2021 for construction, each with a capacity of 500 pounds per hour, with a total maximum extruding capacity of 12,000 pounds per hour, equipped with a dust collector for particulate control, identified as ID-007-1 and exhausting to stack 007-1.

(b) Sawing operations following each Extruders 35 through 58 to size plastic timber, approved in 2021 for construction, with a total maximum capacity of processing 12,000 pounds per hour, using a dust collector, identified as ID-007-1 for particulate control and exhausting to stack 007-1.

New machining operation for construction at existing Building 5B:

(a) Twelve (12) CNC machines and sawing, approved in 2021 for construction, with a maximum total capacity of processing 4,608 pounds per hour of raw plastic timber controlled by existing dust collector for PM control, identified as control equipment ID-001-4, exhausting through stack 72.

New machining operation at new Building 8:

(a) Twenty-four (24) CNC machines and sawing, approved in 2021 for construction, with a maximum total capacity of processing 9,216 pounds per hour of raw plastic timber. PM emissions from twelve (12) CNC machines and saws are controlled by dust collector, identified as ID-008-1, exhausting through stack 81. PM emissions from the other twelve (12) CNC machines and saws are controlled by dust collector, identified as ID-008-2, exhausting through stack 82.

(b) Twenty (20) natural-gas-fired combustion units, consisting of the following:
(1) Five (5) Forced Air Thermocyclers, each with maximum heat input of 720,000 Btu/hour (total of 3.6 MMBtu/hour).

(2) Four (4) Forced Air Roof Top HVAC units, each with maximum heat input of 300,000 Btu/hour (total of 1.20 MMBtu/hour).

(3) Four (4) Tube Heaters in the ceiling, each with maximum heat input of 75,000 Btu/hour (total of 0.30 MMBtu/hour).

(4) Five (5) Forced Air, each with maximum heat input of 100,000 Btu/hour (total of 0.50 MMBtu/hour).

(5) Two (2) Ovens, each with maximum heat input of 1,000,000 Btu/hour (total of 2.0 MMBtu/hour).

c) One (1) diesel-fired emergency generator, identified as EmGen3, approved in 2021 for constructed, rated at 338 hp.

The following construction conditions are applicable to the proposed project:

**General Construction Conditions**

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

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

**Effective Date of the Permit**

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

**Commenced Construction**

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

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

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

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised. The permit references the below-listed attachments. Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this revision:

Attachment A: 40 CFR Part 60, Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines

Attachment B: 40 CFR Part 63, Subpart ZZZZ, Stationary Reciprocating Internal Combustion Engines
Previously issued approvals for this source containing these attachments are available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](http://www.in.gov/ai/appfiles/idem-caats/).

Previously issued approvals for this source are also available via IDEM’s Virtual File Cabinet (VFC). To access VFC, please go to: [http://www.in.gov/idem/](http://www.in.gov/idem/) and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.


A copy of the permit is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](http://www.in.gov/ai/appfiles/idem-caats/). A copy of the application and permit is also available via IDEM’s Virtual File Cabinet (VFC). To access VFC, please go to: [http://www.in.gov/idem/](http://www.in.gov/idem/) and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: [https://www.in.gov/idem/airpermit/2358.htm](https://www.in.gov/idem/airpermit/2358.htm); and the Citizens’ Guide to IDEM on the Internet at: [https://www.in.gov/idem/6900.htm](https://www.in.gov/idem/6900.htm).

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions regarding this matter, please contact Aida DeGuzman, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-4972 or (800) 451-6027, and ask for Aida DeGuzman or (317) 233-4972.

Sincerely,

Josiah K. Balogun, Section Chief
Permits Branch
Office of Air Quality

Attachments: Revised permit and Technical Support Document.

cc: File - Kosciusko County
Kosciusko County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Northern Regional Office
Federally Enforceable State Operating Permit Renewal

OFFICE OF AIR QUALITY

Poly-Wood, LLC
1001 W Brooklyn St
Syracuse, Indiana 46567

(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.

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

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

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

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<td>Expiration Date: February 7, 2030</td>
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Minor Permit Revision No.: 085 43009 00132, issued on July 21, 2020

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Attachment A:  40 CFR Part 60, Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines
Attachment B:  40 CFR Part 63, Subpart ZZZZ, Stationary Reciprocating Internal Combustion Engines
SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary Household Furniture Manufacturing.

- Source Address: 1001 W Brooklyn St, Syracuse, Indiana 46567
- General Source Phone Number: 574-337-3770
- SIC Code: 2519
- County Location: Kosciusko
- Source Location Status: Attainment for all criteria pollutants
- Source Status: Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) One (1) plastic product manufacturing line EU001, located in Building 1, constructed in 2001, modified in 2016, modified in 2017, modified in 2018, and approved in 2019 for modification consisting of the following:

(1) Eighteen (18) plastic extruders, identified as Extruders 1 through 18, approved in 2019 for modification, each with a maximum capacity of 500 pounds per hour, with a total maximum extruding capacity of 9,000 pounds per hour, equipped with a dust collector for particulate control, identified as control equipment ID 001-1 and exhausting indoors;

(2) Sawing operations following extrusion to size plastic timber, approved in 2019 for modification, with a maximum capacity of processing 9,000 pounds per hour, each saw is controlled by a dust collector and exhausting indoors;

(b) One (1) plastic product manufacturing line EU007, located in Building 7, approved in 2019 for construction, approved in 2020 for modification, consisting of the following:

(1) Eight (8) plastic extruders, identified as Extruders 19 through 26, approved in 2019 for construction, each with a maximum capacity of 500 pounds per hour, with a total maximum extruding capacity of 4,000 pounds per hour, equipped with a dust collector for particulate control, identified as control equipment ID 007-1 and exhausting to stack 007-1;

(2) Sawing operations following extrusion to size plastic timber, approved in 2019 for construction, with a maximum capacity of processing 4,000 pounds per hour, using a dust collector, identified as ID-007-1 for particulate control and exhausting to stack 007-1;
(3) Eight (8) plastic extruders, identified as Extruders 27 through 34, approved in 2020 for construction, each with a capacity of 500 pounds per hour, with a total maximum extruding capacity of 4,000 pounds per hour, equipped with a dust collector for particulate control, identified as ID-007-1 and exhausting to stack 007-1.

(4) Sawing operations following extrusion to size plastic timber, approved in 2020 for construction, with a maximum capacity of processing 4,000 pounds per hour, using a dust collector, identified as ID-007-1 for particulate control and exhausting to stack 007-1;

(5) Twenty-four (24) plastic extruders, identified as Extruders 35 through 58, approved in 2021 for construction, each with a capacity of 500 pounds per hour, with a total maximum extruding capacity of 12,000 pounds per hour, equipped with a dust collector for particulate control, identified as ID-007-1 and exhausting to stack 007-1

(6) Sawing operations following each Extruders 35 through 58 to size plastic timber, approved in 2021 for construction, with a total maximum capacity of processing 12,000 pounds per hour, using a dust collector, identified as ID-007-1 for particulate control and exhausting to stack 007-1.

(c) Two (2) machining operations, constructed in 2018, located in Building 5, and consisting of the following:

(1) Building 5A - Twenty three (23) CNC machines and sawing, with a maximum capacity of processing 8,830 pounds per hour of raw plastic timber, using dust collectors as PM control, identified as control equipment ID 001-6, exhausting through stack 107.

(2) Building 5B - Machining operations consisting of the following:

(A) Six (6) CNC machines and sawing, with a maximum total capacity of processing 2,304 pounds per hour of raw plastic timber using dust collectors as PM control, identified as control equipment ID-001-4, exhausting through stack 72

(B) One (1) CNC machine and sawing, approved in 2019 for construction, with a maximum capacity of 384 pounds per hour of raw plastic timber, using dust collectors as PM control, identified as control equipment ID-001-4, exhausting through stack 72.

(C) Twelve (12) CNC machines and sawing, approved in 2021 for construction, with a maximum total capacity of processing 4,608 pounds per hour of raw plastic timber controlled by existing dust collector for PM control, identified as control equipment ID-001-4, exhausting through stack 72.

(d) One (1) plastic product manufacturing line, constructed in 2011, located in Building 4, and consisting of the following:

(1) One (1) aluminum frame construction operations, identified as EU002, constructed in 2011, and modified in 2016, with a maximum capacity of 607.2 pounds per hour, including sawing, CNC, brake press, sanding/grinding units,
using a dust collector and filter as PM control, identified as control equipment ID 002-1, and exhausting indoors.

(2) One (1) powder coating operation, identified as EU003, constructed in 2011 and modified in 2016, with a maximum capacity of 36 pounds per hour, using a dust collector and filter as PM control, identified as control equipment ID 003-1, and exhausting indoors.

(3) Building 4 plastic machining operations, including two (2) CNC machines, three (3) saws, and five (5) routers, constructed in 2018, with a maximum capacity of processing 768 pounds per hour of raw plastic timber, not associated with the process line, using dust collector as PM control, identified as control equipment ID 001-5, and exhausting through stack 96.

(e) One (1) machining operation, approved in 2020 for construction, located in Building 6, and consisting of the following:

(1) Ten (10) CNC machines and Saws, with a maximum capacity of processing 3,840 pounds per hour of raw plastic timber, using dust collector, identified as ID-006-1 for PM control, and exhausting through stack 69.

(f) One (1) machining operation, approved in 2021 for construction at new Building 8, consisting of the following:

(1) Twenty-four (24) CNC machines and sawing, with a maximum total capacity of processing 9,216 pounds per hour of raw plastic timber. PM emissions from twelve (12) CNC machines and saws are controlled by dust collector, identified as ID-008-1, exhausting through stack 81. PM emissions from the other twelve (12) CNC machines and saws are controlled by dust collector, identified as ID-008-2, exhausting through stack 82.

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

This stationary source also includes the following insignificant activities:

(a) Seventy-four (74) natural gas combustion units, constructed in 2011, modified in 2016, and constructed in 2017, consisting of a total heat input capacity of 13.243 MMBTU per hour for comfort heating, 1.5 MMBTU per hour for heating the powder coating washers, 0.35 MMBtu per hour for process water heater, process ovens totaling 4.541 MMBtu per hour, and 1.147 MMBtu per hour for heating the plastic washer.

(b) Two (2) portable diesel-fired emergency generators, constructed in 2001, rated at 10 hp each.

Under 40 CFR 63, Subpart ZZZZ, these non-stationary generators are exempt

Under 40 CFR 60, Subpart IIII, these non-stationary generators are exempt

(c) Plastics products design center, including one (1) CNC machine, with a maximum capacity of processing 384 pounds per hour of raw plastic timber, constructed in 2001, modified in 2016, modified in 2017, and modified in 2018, not associated with the process line or manufacturing, controlled by dust collector, identified as control equipment ID 001-2, exhausting out stack #23.

(e) Plastics products mixer, processing 6,300 pounds per hour, enclosed process with pneumatic conveyance to extruder, constructed in 2001, modified in 2016, modified in 2017, and modified in 2018.

(f) Plastics products raw plastics storage, pneumatic conveying a maximum of 4038 pounds per hour to the mixer, constructed in 2001, modified in 2016, and modified in 2017, equipped with a voluntary dust collector for recycle fine collection, identified as control equipment ID 001-1, exhausting indoors.

(g) Process washer for powder coating using non-VOC and Non-HAP liquids, approved in 2020 for construction.

(h) Welding operations, with a maximum capacity of 540 pounds of hour of material, constructed in 2011, modified in 2016, and modified in 2017, exhausting indoors, consisting of the following:

1. Nine (9) MIG welding cells with a maximum capacity of using 0.25 pounds per hour of wire each;

2. One (1) MIG welding cell with a maximum capacity of using 0.13 pounds per hour of wire; and

3. Eight (8) TIG welding cells with a maximum capacity of using 0.41 pounds per hour of wire.

(i) One (1) Natural Gas Emergency Generator (4-stroke lean-burn), identified as EmGen 1, permitted in 2017, with a maximum capacity of 192 Hp, and uncontrolled.

Under 40 CFR 60, Subpart JJJJ, EmGen1, is considered an affected facility.
Under 40 CFR 63, Subpart ZZZZ, EmGen1, is considered an affected facility.

(j) One (1) natural gas-fired emergency generator (4-stroke lean-burn), identified as EmGen 2, approved in 2019 for construction, rated at 46 kW (156,959 Btu/hr) and using no control.

[Under 40 CFR 60, Subpart JJJJ, EmGen2, is an affected facility.]
[Under 40 CFR 63, Subpart ZZZZ, EmGen2, is an affected facility.]

(k) One (1) natural gas-fired process washer heater, approved in 2019 for construction, heat input rating of 0.35083 MMBtu/hr, and using no control.

(l) One (1) plastic product manufacturing line identified as Extrusion LAB, located in Building 2, constructed in 2020 consisting of the following:

1. One (1) plastic extruder, approved in 2020 for construction, with a maximum capacity of 50 pounds per hour.

2. Sawing operations following extruder to size plastic timber, with a maximum processing capacity of 50 pounds per hour, uncontrolled and exhausting indoors.
(m) One (1) Tool and Die Washer, located in building 1, approved in 2020 for construction, with a maximum cleaning capacity of 130 pounds per hour.

(n) Two (2) natural gas heating units, located in Building 5, approved in 2020 for construction, with a maximum heat input capacity of 0.045 MMBtu per hour each.

(o) Six (6) natural gas combustion heating units, located in building 7, approved in 2020 for construction, with a maximum heat input capacity of 3.64 MMBtu per hour.

(p) Twenty (20) natural-gas-fired combustion units, consisting of the following:

   1. Five (5) Forced Air Thermocyclers, each with maximum heat input of 720,000 Btu/hour (total of 3.6 MMBtu/hour).

   2. Four (4) Forced Air Roof Top HVAC units, each with maximum heat input of 300,000 Btu/hour (total of 1.20 MMBtu/hour).

   3. Four (4) Tube Heaters in the ceiling, each with maximum heat input of 75,000 Btu/hour (total of 0.30 MMBtu/hour).

   4. Five (5) Forced Air, each with maximum heat input of 100,000 Btu/hour (total of 0.50 MMBtu/hour).

   5. Two (2) Ovens, each with maximum heat input of 1,000,000 Btu/hour (total of 2.0 MMBtu/hour).

(q) One (1) natural gas-fired emergency generator, identified as EmGen3, manufactured in 2020 and approved in 2021 for construction, rated at 338 hp.

   [Under 40 CFR 60, Subpart JJJJ, EmGen3, is an affected facility.]

   [Under 40 CFR 63, Subpart ZZZZ, EmGen2, is an affected facility.]

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

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

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

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

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

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

(a) This permit, F085-41789-00132, 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.5 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.6 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
B.7 Severability [326 IAC 2-8-4(4)]

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

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

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

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

B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

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

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

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

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

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

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

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

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

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

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

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

1. Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
2. A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
3. Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

1. Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
2. A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
3. Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
If, due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

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

The Permittee shall implement the PMPs.

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

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

B.14 Emergency Provisions [326 IAC 2-8-12]

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

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

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

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

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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

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

(A) A description of the emergency;
(B) Any steps taken to mitigate the emissions; and
(C) Corrective actions taken.

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

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

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

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

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

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

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

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

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

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

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

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

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F085-41789-00132 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.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]
The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

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

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

(1) That this permit contains a material mistake.

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

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

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

B.18 Permit Renewal [326 IAC 2-8-3(h)]

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

Request for renewal shall be submitted to:

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

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

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

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

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

B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

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

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

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

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

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

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.
Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

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

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

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

B.21 Source Modification Requirement [326 IAC 2-8-11.1]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

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

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

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

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

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

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]
(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

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

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]
For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.
SECTION C  SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.
Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

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

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

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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

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

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

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

(e) The Permittee shall record the reasonable response steps taken.
C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(b) The address for report submittal is:

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

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

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

Stratospheric Ozone Protection

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

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

Emissions Unit Description:

(a) One (1) plastic product manufacturing line EU001, located in Building 1, constructed in 2001, modified in 2016, modified in 2017, modified in 2018, and approved in 2019 for modification consisting of the following:

(1) Eighteen (18) plastic extruders, identified as Extruders 1 through 18, approved in 2019 for modification, each with a maximum capacity of 500 pounds per hour, with a total maximum extruding capacity of 9,000 pounds per hour, equipped with a dust collector for particulate control, identified as control equipment ID 001-1 and exhausting indoors;

(2) Sawing operations following extrusion to size plastic timber, approved in 2019 for modification, with a maximum capacity of processing 9,000 pounds per hour, each saw is controlled by a dust collector and exhausting indoors.

(b) One (1) plastic product manufacturing line EU007, located in Building 7, approved in 2019 for construction, approved in 2020 for modification, consisting of the following:

(1) Eight (8) plastic extruders, identified as Extruders 19 through 26, approved in 2019 for construction, each with a maximum capacity of 500 pounds per hour, with a total maximum extruding capacity of 4,000 pounds per hour, equipped with a dust collector for particulate control, identified as control equipment ID 007-1 and exhausting to stack 007-1;

(2) Sawing operations following extrusion to size plastic timber, approved in 2019 for construction, with a maximum capacity of processing 4,000 pounds per hour, using a dust collector, identified as ID-007-1 for particulate control and exhausting to stack 007-1;

(3) Eight (8) plastic extruders, identified as Extruders 27 through 34, approved in 2020 for construction, each with a capacity of 500 pounds per hour, with a total maximum extruding capacity of 4,000 pounds per hour, equipped with a dust collector for particulate control, identified as ID-007-1 and exhausting to stack 007-1.

(4) Sawing operations following extrusion to size plastic timber, approved in 2020 for construction, with a maximum capacity of processing 4,000 pounds per hour, using a dust collector, identified as ID-007-1 for particulate control and exhausting to stack 007-1;

(5) Twenty-four (24) plastic extruders, identified as Extruders 35 through 58, approved in 2021 for construction, each with a capacity of 500 pounds per hour, with a total maximum extruding capacity of 12,000 pounds per hour, equipped with a dust collector for particulate control, identified as ID-007-1 and exhausting to stack 007-1.

(6) Sawing operations following each Extruders 35 through 58 to size plastic timber, approved in 2021 for construction, with a total maximum capacity of processing 12,000 pounds per hour, using a dust collector, identified as ID-007-1 for particulate control and exhausting to stack 007-1.

(c) Two (2) machining operations, constructed in 2018, located in Building 5, and consisting of the following:
<table>
<thead>
<tr>
<th></th>
<th>Building 5A - Twenty three (23) CNC machines and sawing, with a maximum capacity of processing 8,830 pounds per hour of raw plastic timber, using dust collectors as PM control, identified as control equipment ID 001-6, exhausting through stack 107.</th>
</tr>
</thead>
<tbody>
<tr>
<td>(2)</td>
<td>Building 5B - Machining operations consisting of the following:</td>
</tr>
<tr>
<td></td>
<td>(A) Six (6) CNC machines and sawing, with a maximum total capacity of processing 2,304 pounds per hour of raw plastic timber using dust collectors as PM control, identified as control equipment ID-001-4, exhausting through stack 72</td>
</tr>
<tr>
<td></td>
<td>(B) One (1) CNC machine and sawing, approved in 2019 for construction, with a maximum capacity of 384 pounds per hour of raw plastic timber, using dust collectors as PM control, identified as control equipment ID-001-4, exhausting through stack 72.</td>
</tr>
<tr>
<td></td>
<td>(C) Twelve (12) CNC machines and sawing, approved in 2021 for construction, with a maximum total capacity of processing 4,608 pounds per hour of raw plastic timber controlled by existing dust collector for PM control, identified as control equipment ID-001-4, exhausting through stack 72.</td>
</tr>
<tr>
<td>(d)</td>
<td>One (1) plastic product manufacturing line, constructed in 2011, located in Building 4, and consisting of the following:</td>
</tr>
<tr>
<td></td>
<td>(1) One (1) aluminum frame construction operations, identified as EU002, constructed in 2011, and modified in 2016, with a maximum capacity of 607.2 pounds per hour, including sawing, CNC, brake press, sanding/grinding units, using a dust collector and filter as PM control, identified as control equipment ID 002-1, and exhausting indoors.</td>
</tr>
<tr>
<td></td>
<td>(2) One (1) powder coating operation, identified as EU003, constructed in 2011 and modified in 2016, with a maximum capacity of 36 pounds per hour, using a dust collector and filter as PM control, identified as control equipment ID 003-1, and exhausting indoors.</td>
</tr>
<tr>
<td></td>
<td>(3) Building 4 plastic machining operations, including two (2) CNC machines, three (3) saws, and five (5) routers, constructed in 2018, with a maximum capacity of processing 768 pounds per hour of raw plastic timber, not associated with the process line, using dust collector as PM control, identified as control equipment ID 001-5, and exhausting through stack 96.</td>
</tr>
<tr>
<td>(e)</td>
<td>One (1) machining operation, approved in 2020 for construction, located in Building 6, and consisting of the following:</td>
</tr>
<tr>
<td></td>
<td>(1) Ten (10) CNC machines and Saws, with a maximum capacity of processing 3,840 pounds per hour of raw plastic timber, using dust collectors, identified as ID-006-1 for PM control, and exhausting through stack 69.</td>
</tr>
<tr>
<td>(f)</td>
<td>One (1) machining operation, approved in 2021 for construction at new Building 8, consisting of the following:</td>
</tr>
<tr>
<td></td>
<td>(1) Twenty-four (24) CNC machines and sawing, with a maximum total capacity of processing 9,216 pounds per hour of raw plastic timber. PM emissions from twelve (12) CNC machines and saws are controlled by dust collector, identified as ID-008-1, exhausting through stack 81. PM emissions from the other twelve (12) CNC machines...</td>
</tr>
</tbody>
</table>
and saws are controlled by dust collector, identified as ID-008-2, exhausting through stack 82.

**Insignificant Activities:**

(c) Plastics products design center, including one (1) CNC machine, with a maximum capacity of processing 384 pounds per hour of raw plastic timber, constructed in 2001, modified in 2016, modified in 2017, and modified in 2018, not associated with the process line or manufacturing, controlled by dust collector, identified as control equipment ID 001-2, exhausting out stack #23.


(e) Plastics products mixer, processing 6,300 pounds per hour, enclosed process with pneumatic conveyance to extruder, constructed in 2001, modified in 2016, modified in 2017, and modified in 2018.

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

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

**D.1.1 FESOP Limits [326 IAC 2-8-4]**

Pursuant to 326 IAC 2-8-4 (FESOP) and to render the requirements of 326 IAC 2-7 not applicable, the source shall comply with the following:

(a) The total PM10 emissions from Building 1 extruder saws, each controlled by a dedicated baghouse, shall not exceed 0.60 pounds per hour.

(b) The total PM10 emissions from Building 1 extruder saws, each controlled by a dedicated baghouse shall not exceed 0.30 pounds per hour.

(c) The total PM10 emissions from from the dust collector, identified as ID 007-1 controlling forty (40) extruder saws at Bldg 7, shall not exceed 3.88 pounds per hour.

(d) The total PM2.5 emissions from from the dust collector, identified as ID 007-1 controlling forty (40) extruder saws at Bldg 7, shall not exceed 0.44 pounds per hour.

(e) The PM10 emissions from the dust collector, identified as ID 002-1 controlling the Aluminium Frame operations, identified as EU002 shall not exceed 7.0 pounds per hour.

(f) The PM-2.5 emissions from the dust collectors controlling the Aluminium Frame operations, shall not exceed 3.12 lbs per hour.

(g) The PM10 emissions from the dust collector, identified as ID-006-1 controlling the Powder Coating, identified as EU003, shall not exceed 4.86 pounds per hour.

(h) The PM-2.5 emissions from the dust collectors controlling the Powder Coating Operations shall not exceed 3.51 lbs per hour.

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

D.1.2 Prevention of Significant Deterioration (PSD) Minor Limits [326 IAC 2-2]

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

(a) The total PM emissions from Building 1 extruder saws, each controlled by a dedicated baghouse, shall not exceed 0.57 pounds per hour.

(b) The total PM emissions from the dust collector, identified as ID 007-1 controlling forty (40) extruder saws at Bldg 7, shall not exceed 3.64 pounds per hour.

(b) The PM emissions from the dust collector, identified as ID 001-6 controlling the twenty-three (23) machining units at Bldg 5A, shall not exceed 4.63 pounds per hour.

(c) The PM emissions from the dust collector, identified as ID-001-4 controlling nineteen (19) machining units at Bldg 5B, shall not exceed 4.02 pounds per hour.

(d) The PM emissions from the dust collectors, identified as ID-008-1 controlling twelve (12) machining units at Bldg 8, shall not exceed 2.42 pounds per hour.

(e) The PM emissions from the dust collectors, identified as ID-008-2 controlling twelve (12) machining units at Bldg 8, shall not exceed 2.42 pounds per hour.

(f) The PM emissions from the dust collector, identified as ID 002-1 controlling the Aluminium Frame operations, identified as EU002 shall not exceed 21.82 pounds per hour.

(g) The PM emissions from the dust collector, identified as ID-006-1 controlling the Powder Coating, identified as EU003, shall not exceed 9.0 pounds per hour.

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

D.1.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the plastic machining, aluminum frame operations, and powder coating operations shall not exceed the following:

<table>
<thead>
<tr>
<th>Operation</th>
<th>Process Weight (ton/hour)</th>
<th>PM Limit (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>23 Plastics Machining Process (Building 5A)</td>
<td>4.42</td>
<td>11.09</td>
</tr>
<tr>
<td>19 Plastics Machining Process (Building 5B)</td>
<td>3.65</td>
<td>9.76</td>
</tr>
<tr>
<td>Plastics Machining Process (Building 4)</td>
<td>0.38</td>
<td>2.16</td>
</tr>
<tr>
<td>Aluminum Framing (sanding) (Building 4)</td>
<td>0.30</td>
<td>1.84</td>
</tr>
<tr>
<td>Powder Coating Operations (Building 4)</td>
<td>0.02</td>
<td>0.28</td>
</tr>
<tr>
<td>Operation</td>
<td>Process Weight (ton/hour)</td>
<td>PM Limit (lbs/hr)</td>
</tr>
<tr>
<td>-----------------------------------</td>
<td>---------------------------</td>
<td>-------------------</td>
</tr>
<tr>
<td>10 Plastic Machining (Building 6)</td>
<td>1.92</td>
<td>6.35</td>
</tr>
<tr>
<td>24 Plastic Machining (Building 8)</td>
<td>4.6</td>
<td>11.40</td>
</tr>
</tbody>
</table>

The pound per hour limitation was calculated with the following equation:

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

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

The dust collectors for the emission units specified above, identified as control equipment, ID 001-6 (Bldg 5A), ID 002-1 (Al framing), ID 001-4 (Bldg 5B), ID 003 (powder coating), ID 008-1 (Bldg 8) and ID-008-2 (Bldg 8) shall be in operation at all times each emission unit is in operation, in order to comply with this limit.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

D.1.5 Particulate Matter Control

(a) In order to assure compliance with Conditions D.1.1, D.1.2, and D.1.3, the dust collectors for particulate control from the plastic machining, plastic sawing, framing sanding, and powder coating shall be in operation and control emissions from the plastic machining, plastic sawing, framing sanding, and powder coating at all times the associated process is in operation.

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

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

D.1.6 Broken or Failed Bag Detection

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

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit Section B - Emergency Provisions.
Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

D.1.7 Dust collector inspections

(a) The Permittee shall perform semi-annual inspections of dust collectors, identified as control equipment ID 001-6 (Bldg 5A) and ID 001-4 (Bldg 5B), controlling particulate emissions from the Building 5A plastics machining operations, and Building 5B plastics machining operations, respectively, when venting indoors, to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

(b) The Permittee shall perform semi-annual inspections of dust collector ID 002-1, controlling particulate from the Aluminum frame construction operation (Sanding), identified as EU002, when venting indoors, to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

(c) The Permittee shall perform semi-annual inspections of dust collector ID 003-1, controlling particulate from the powder coating operation, identified as EU-003, to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.1.8 Visible Emissions Notations

(a) Visible emission notations of dust collectors, identified as control equipment ID 001-6 (Bldg 5A), and ID 001-4 (Bldg 5B), ID-008-1 (Bldg 8) and ID-008-2 (Bldg 8), stack exhausts shall be performed once per day during normal daylight operations, when venting outdoors. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

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

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

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

D.1.9 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.7, the Permittee shall maintain
records of the dates and results of the inspections required under Condition D.1.7 and the dates the vents are redirected.

(b) To document the compliance status with Condition D.1.8 - Visible Emissions Notations, the Permittee shall maintain records of daily visible emission notations of the dust collectors stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(c) 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:

(k) One (1) natural gas-fired process washer heater, approved in 2019 for construction, heat input rating of 0.35083 MMBtu/hr, and using no control.

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

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

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

Pursuant to 326 IAC 6-2-4, the particulate emissions from the one (1) natural gas-fired process washer heater shall be limited to 0.60 pounds of particulate matter per MMBtu heat input.

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

A Preventive Maintenance Plan (PMP) is required for this unit. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.
SECTION E.1 NSPS

Emissions Unit Description:

(i) One (1) Natural Gas Emergency Generator (4-stroke lean-burn), identified as EmGen 1, permitted in 2017, with a maximum output of 192 hp, uncontrolled, and exhausting to stack NGS1.

[Under 40 CFR 60, Subpart JJJJ, EmGen1, is an affected facility.]

(j) One (1) Natural Gas Emergency Generator (4-stroke lean-burn), identified as EmGen 2, approved in 2019 for construction, rated at 46 kW (156,959 Btu/hr) and using no control.

[Under 40 CFR 60, Subpart JJJJ, EmGen2, is an affected facility.]

(q) One (1) natural gas-fired emergency generator, identified as EmGen3, manufactured in 2020 and approved in 2021 for constructed, rated at 338 hp.

[Under 40 CFR 60, Subpart JJJJ, EmGen3, is an affected facility.]

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

New Source Performance Standards (NSPS) Requirements [326 IAC 2-8-4(1)]

E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]

(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 60, Subpart JJJJ.

(b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports to:

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

E.1.2 Stationary Spark Ignition Internal Combustion Engines NSPS [326 IAC 12][40 CFR Part 60, Subpart JJJJ]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart JJJJ (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 12:

(a) EmGen 1

(1) 40 CFR 60.4230(a)(4)(iv)
(2) 40 CFR 60.4233(e)
(3) 40 CFR 60.4234
(4) 40 CFR 60.4243(b), (d)(1), (d)(2)(i), (d)(3), (e), and (f)
(5) 40 CFR 60.4245(a)
(6) 40 CFR 60.4246
(7) 40 CFR 60.4248
(8) Table 1 to 40 CFR 60, Subpart JJJJ
(9) Table 3 to 40 CFR 60, Subpart JJJJ

(b) EmGen 2

(1) 40 CFR 60.4230(a)(4)(iv)
(2) 40 CFR 60.4233(d)
(3) 40 CFR 60.4234
(4) 40 CFR 60.4243(b), (d)(1), (d)(2)(i), (d)(3), (e), and (f)
(5) 40 CFR 60.4245(a)
(6) 40 CFR 60.4246
(7) 40 CFR 60.4248
(8) Table 1 to 40 CFR 60, Subpart JJJJ
(9) Table 3 to 40 CFR 60, Subpart JJJJ

(c) EmGen3

(1) 40 CFR 60.4230(a)(4)(iv), (6)
(2) 40 CFR 60.4233(e)
(3) 40 CFR 60.4234
(4) 40 CFR 60.4237(b)
(5) 40 CFR 60.4243(b), (d)(1), (d)(2)(i), (d)(3), (e), and (f)
(6) 40 CFR 60.4245(a), (e)
(7) 40 CFR 60.4246
(8) 40 CFR 60.4248
(9) Table 1 to 40 CFR 60, Subpart JJJJ
(10) Table 3 to 40 CFR 60, Subpart JJJJ

E.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan (PMP) is required for this unit. Section B - Preventive Maintenance Plan contains the Permittee’s obligations with regard to the preventive maintenance plan required by this condition.
### Emissions Unit Description:

(i) One (1) Natural Gas Emergency Generator (4-stroke lean-burn), identified as EmGen 1, permitted in 2017, with a maximum output of 192 hp, uncontrolled, and exhausting to stack NGS1.

[Under 40 CFR 63, Subpart ZZZZ, EmGen1 is an affected facility.]

(j) One (1) Natural Gas Emergency Generator (4-stroke lean-burn), identified as EmGen 2, approved in 2019 for construction, rated at 46 kW (156,959 Btu/hr) and using no control.

[Under 40 CFR 63, Subpart ZZZZ, EmGen2 is an affected facility.]

(q) One (1) natural gas-fired emergency generator, identified as EmGen3, manufactured in 2020 and approved in 2021 for constructed, rated at 338 hp.

[Under 40 CFR 63, Subpart ZZZZ, EmGen3 is an affected facility.]

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

### National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-8-4(1)]


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

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

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

#### E.2.2 Stationary Reciprocating Internal Combustion Engines NESHAP [40 CFR Part 63, Subpart ZZZZ][326 IAC 20-82]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 20-82, for the emission units listed above:

1. 40 CFR 63.6580
2. 40 CFR 63.6585(c)
3. 40 CFR 63.6590(a)(2)(iii)
4. 40 CFR 63.6595 (a)(7)
5. 40 CFR 63.6665
E.2.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan (PMP) is required for this unit. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the preventive maintenance plan required by this condition.

(6) 40 CFR 63.6670
(7) 40 CFR 63.6675
(8) Table 8 to Subpart ZZZZ of Part 63
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name: Poly-Wood, LLC
Source Address: 1001 W Brooklyn St, Syracuse, Indiana 46567
FESOP Permit No.: F085-41789-00132

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

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

Source Name: Poly-Wood, LLC
Source Address: 1001 W Brooklyn St, Syracuse, Indiana 46567
FESOP Permit No.: F085-41789-00132

This form consists of 2 pages

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

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

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

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

Form Completed by: ________________________________________________  
Title / Position: ____________________________________________________  
Date: ____________________________________________________________  
Phone: ____________________________________________________________
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Poly-Wood, LLC  
Source Address: 1001 W Brooklyn St, Syracuse, Indiana 46567  
FESOP Permit No.: F085-41789-00132  

Months: ___________ to ____________ Year: ______________

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

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<tr>
<th>Permit Requirement</th>
<th>Date of Deviation</th>
<th>Duration of Deviation</th>
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| Number of Deviations: |  |

| Probable Cause of Deviation: |  |

| Response Steps Taken: |  |

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| Number of Deviations: |  |

| Probable Cause of Deviation: |  |

<p>| Response Steps Taken: |  |</p>
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<td>Duration of Deviation:</td>
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<td>Probable Cause of Deviation:</td>
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<td>Response Steps Taken:</td>
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<td>Response Steps Taken:</td>
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Form Completed by: _______________________________________________________

Title / Position: ___________________________________________________________

Date: ___________________________________________________________________

Phone: _________________________________________________________________
Indiana Department of Environmental Management  
Office of Air Quality  

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

Source Description and Location

| Source Name: | Poly-Wood, LLC |
| Source Location: | 1001 W. Brooklyn Street, Syracuse, Indiana 46567 |
| County: | Kosciusko |
| SIC Code: | 2519 (Household Furniture, Not Elsewhere Classified) |
| Operation Permit No.: | F 085-41789-00132 |
| Operation Permit Issuance Date: | February 7, 2020 |
| Significant Permit Revision No.: | 085-43740-00132 |
| Permit Reviewer: | Aida DeGuzman |

Existing Approvals

The source was issued FESOP Renewal No. 085-41789-00132 on February 7, 2020. The source has since received the following approval:

(a) Administrative Amendment No. 085-42668-00132, issued on April 16, 2020; and

(b) Minor Permit Revision No. 085-43009-00132, issued on July 21, 2020.

County Attainment Status

The source is located in Kosciusko County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
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<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM₂.₅ standard.</td>
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<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

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

(b) PM₂.₅
Kosciusko County has been classified as attainment for PM₂.₅. Therefore, direct PM₂.₅, SO₂, and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
(c) Other Criteria Pollutants

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

### Fugitive Emissions

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

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

### Greenhouse Gas (GHG) Emissions

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

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

### Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Source-Wide Emissions Prior to Revision (ton/year)</th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂.₅¹-²</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAPs</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>226.34</td>
<td>74.40</td>
<td>42.20</td>
<td>0.06</td>
<td>11.20</td>
<td>2.94</td>
<td>9.71</td>
<td>2.54 Hexane</td>
<td>2.57</td>
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<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
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<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
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(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).
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.

These emissions are based on the TSD of Minor Permit Revision No. 085-43009-00132, issued on July 21, 2020.

### Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Poly-Wood, LLC on February 8, 2021, relating to the addition of new equipment.

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

**New plastic extruders for construction at existing Building 7:**

(a) Twenty-four (24) plastic extruders, identified as Extruders 35 through 58, approved in 2021 for construction, each with a capacity of 500 pounds per hour, with a total maximum extruding capacity of 12,000 pounds per hour, equipped with a dust collector for particulate control, identified as ID-007-1 and exhausting to stack 007-1.

(b) Sawing operations following each Extruders 35 through 58 to size plastic timber, approved in 2021 for construction, with a total maximum capacity of processing 12,000 pounds per hour, using a dust collector, identified as ID-007-1 for particulate control and exhausting to stack 007-1;

**New machining operation for construction at existing Building 5B:**

(a) Twelve (12) CNC machines and sawing, approved in 2021 for construction, with a maximum total capacity of processing 4,608 pounds per hour of raw plastic timber controlled by existing dust collector for PM control, identified as control equipment ID-001-4, exhausting through stack 72

**New machining operation at new Building 8:**

(a) Twenty-four (24) CNC machines and sawing, approved in 2021 for construction, with a maximum total capacity of processing 9,216 pounds per hour of raw plastic timber. PM emissions from twelve (12) CNC machines and saws are controlled by dust collector, identified as ID-008-1, exhausting through stack 81. PM emissions from the other twelve (12) CNC machines and saws are controlled by dust collector, identified as ID-008-2, exhausting through stack 82.

(b) Twenty (20) natural-gas-fired combustion units, consisting of the following:

1. Five (5) Forced Air Thermocyclers, each with maximum heat input of 720,000 Btu/hour (total of 3.6 MMBtu/hour).
2. Four (4) Forced Air Roof Top HVAC units, each with maximum heat input of 300,000 Btu/hour (total of 1.20 MMBtu/hour).
3. Four (4) Tube Heaters in the ceiling, each with maximum heat input of 75,000 Btu/hour (total of 0.30 MMBtu/hour).
4. Five (5) Forced Air, each with maximum heat input of 100,000 Btu/hour (total of 0.50 MMBtu/hour).
5. Two (2) Ovens, each with maximum heat input of 1,000,000 Btu/hour (total of 2.0 MMBtu/hour).
One (1) natural gas-fired emergency generator, identified as EmGen3, manufactured in 2020 and approved in 2021 for constructed, rated at 338 hp.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

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

Permit Level Determination – FESOP Significant Permit Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_X$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP$^2$</th>
<th>Total HAP$_{\text{HAPs}}$</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bldg 7 – Plastic Extruders, ID 35-58 (24 Units)</td>
<td>2.52</td>
<td>2.52</td>
<td>2.52</td>
<td>--</td>
<td>--</td>
<td>1.86</td>
<td>0.27</td>
<td>1.86 Hexane</td>
<td>1.86</td>
</tr>
<tr>
<td>Bldg 7 Plastic Saws (24)</td>
<td>8.74</td>
<td>9.32</td>
<td>1.05</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Bldg 5B – 12 CNC and Saws</td>
<td>42.29</td>
<td>3.88</td>
<td>1.63</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>New Bldg 8 – 24 CNC and Saws</td>
<td>84.59</td>
<td>7.76</td>
<td>3.27</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>EmGen 3-Bldg 8</td>
<td>1.7E-05</td>
<td>2.1E-03</td>
<td>2.1E-03</td>
<td>1.3E-04</td>
<td>8.85E-01</td>
<td>2.5E-02</td>
<td>6.8E-02</td>
<td>0.01 Formaldehyde</td>
<td>0.02</td>
</tr>
<tr>
<td>Bldg 8-Natural gas Combustion Units (20 Units)</td>
<td>0.06</td>
<td>0.25</td>
<td>0.25</td>
<td>0.02</td>
<td>3.26</td>
<td>0.18</td>
<td>2.74</td>
<td>0.06 Hexane</td>
<td>0.06</td>
</tr>
<tr>
<td>Total PTE Before Controls of the New Emission Units:</td>
<td>138.20</td>
<td>23.73</td>
<td>8.72</td>
<td>0.02</td>
<td>4.14</td>
<td>2.06</td>
<td>3.46</td>
<td>1.92</td>
<td>1.93</td>
</tr>
</tbody>
</table>

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

$^2$Single highest HAP.

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

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

Pursuant to 326 IAC 2-8-11.1(f), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves adjustment to the PM PSD minor limits.
PTE of the Entire Source After Issuance of the FESOP Revision

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

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM&lt;sub&gt;1&lt;/sub&gt;</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt;</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&gt;</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Single HAP&lt;sup&gt;3&lt;/sup&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plastic product manufacturing line, EU001:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bldg 1 Plastic Extrusion (18 units)</td>
<td>1.89</td>
<td>1.89</td>
<td>1.89</td>
<td>0.00</td>
<td>1.39</td>
<td>0.36</td>
<td>1.39</td>
<td></td>
<td>1.39 Hexane</td>
</tr>
<tr>
<td>1Bldg 1 Extrusion Saws (18 Units)</td>
<td>2.48</td>
<td>2.64</td>
<td>0.30</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Bldg 7 Plastic Extrusion, ID 19-26 (8 Units)</td>
<td>0.84</td>
<td>0.84</td>
<td>0.84</td>
<td>0.00</td>
<td>0.62</td>
<td>0.22</td>
<td>0.62</td>
<td>0.62 Hexane</td>
<td></td>
</tr>
<tr>
<td>Bldg 7 Plastic Extrusion, ID 27-34 (8 Units)</td>
<td>0.84</td>
<td>0.84</td>
<td>0.84</td>
<td>0.00</td>
<td>0.62</td>
<td>0.22</td>
<td>0.62</td>
<td>0.62 Hexane</td>
<td></td>
</tr>
<tr>
<td>Bldg 7 Plastic Extrusion, ID 35-58 (24 Units)-SPR43740</td>
<td>2.52</td>
<td>2.52</td>
<td>2.52</td>
<td>0.00</td>
<td>1.86</td>
<td>0.65</td>
<td>1.86</td>
<td>1.86 Hexane</td>
<td></td>
</tr>
<tr>
<td>1Bldg 7 Extrusion Saws, ID 35-58 (24units)</td>
<td>3.64</td>
<td>3.88</td>
<td>0.44</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>1Bldg 7 Extrusion Saws (16 units)</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Bldg 5A Plastic Machining (23 Units)</td>
<td>20.27</td>
<td>7.44</td>
<td>3.13</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
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<tr>
<td>Bldg 5B - Plastic Machining (6 Units)</td>
<td>1.94</td>
<td>0.82</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
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<tr>
<td>Bldg 5B - Plastic Machining (12 Units)-SPR43740</td>
<td>17.62</td>
<td>3.88</td>
<td>1.63</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Bldg 5B - CNC (1 Unit)</td>
<td>0.32</td>
<td>0.14</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>New Bldg 8 - Plastic Machining (24 Units)-SPR43740</td>
<td>21.15</td>
<td>7.76</td>
<td>3.27</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Bldg 4 - Plastic Machining</td>
<td>7.05</td>
<td>0.65</td>
<td>0.27</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Bldg 6 Plastic Machining (10 CNC and Sawing)</td>
<td>5.22</td>
<td>3.24</td>
<td>1.36</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
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</tr>
<tr>
<td>Aluminum frame construction operation, EU002:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Framing (Sanding)</td>
<td>95.55</td>
<td>30.67</td>
<td>13.66</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Powder Coating EU003</td>
<td>39.42</td>
<td>21.29</td>
<td>15.37</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Insignificant Activities:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Natural Gas Combustion (74 Units)</td>
<td>0.17</td>
<td>0.68</td>
<td>0.68</td>
<td>0.05</td>
<td>8.92</td>
<td>0.49</td>
<td>7.50</td>
<td>0.17</td>
<td>0.16</td>
</tr>
<tr>
<td>Design center</td>
<td>3.52</td>
<td>0.32</td>
<td>0.14</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Emission Unit</td>
<td>PM(^1)</td>
<td>PM(_{10})^1</td>
<td>PM(_{2.5})^1,2</td>
<td>SO(_2)</td>
<td>NO(_x)</td>
<td>VOC</td>
<td>CO</td>
<td>Total HAPs</td>
<td>Single HAP(^3)</td>
</tr>
<tr>
<td>---------------</td>
<td>---------</td>
<td>------------</td>
<td>--------------</td>
<td>--------</td>
<td>------</td>
<td>-----</td>
<td>----</td>
<td>-----------</td>
<td>---------------------</td>
</tr>
<tr>
<td>Hand held tools including routing tables</td>
<td>5.21</td>
<td>2.76</td>
<td>1.54</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Welding</td>
<td>1.83</td>
<td>1.83</td>
<td>1.83</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.02</td>
<td>0.02</td>
</tr>
<tr>
<td>Emergency Generators, 46 kW, 192 Hp</td>
<td>0.000</td>
<td>0.002</td>
<td>0.002</td>
<td>0.000</td>
<td>0.66</td>
<td>0.02</td>
<td>0.05</td>
<td>0.01</td>
<td>0.009</td>
</tr>
<tr>
<td>338 HP EmGen 3 - SPR43740</td>
<td>0.000</td>
<td>0.002</td>
<td>0.002</td>
<td>0.000</td>
<td>0.88</td>
<td>0.03</td>
<td>0.07</td>
<td>0.02</td>
<td>0.011 Formaldehyde</td>
</tr>
<tr>
<td>20 NG Units-Bldg 8 - SPR43740</td>
<td>0.061</td>
<td>0.245</td>
<td>0.245</td>
<td>0.019</td>
<td>3.22</td>
<td>0.18</td>
<td>2.71</td>
<td>0.06</td>
<td>0.058 Hexane</td>
</tr>
<tr>
<td>Bldg 5 Heating Units (2 Units)</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.04</td>
<td>0.00</td>
<td>0.01</td>
<td>0.03</td>
<td>0.001</td>
</tr>
<tr>
<td>Bldg 7 New Heating Units (6 Units) -43009</td>
<td>0.03</td>
<td>0.12</td>
<td>0.12</td>
<td>0.01</td>
<td>1.56</td>
<td>0.09</td>
<td>1.31</td>
<td>0.029</td>
<td>0.028</td>
</tr>
<tr>
<td>Bldg 2 Plastic Extrusion LAB (1 Unit)</td>
<td>0.01</td>
<td>0.01</td>
<td>0.01</td>
<td>-</td>
<td>0.00</td>
<td>0.01</td>
<td>0.00</td>
<td>0.01</td>
<td>0.01</td>
</tr>
<tr>
<td>Bldg 1 Tool and Die Washer</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0.00</td>
<td>0.02</td>
<td>0.01</td>
<td>0.02</td>
<td>0.02</td>
</tr>
<tr>
<td>Process Washer for Powder Coating(^*)</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total PTE of Entire Source</strong></td>
<td><strong>229.32</strong></td>
<td><strong>95.77</strong></td>
<td><strong>51.04</strong></td>
<td><strong>0.08</strong></td>
<td><strong>15.28</strong></td>
<td><strong>5.31</strong></td>
<td><strong>13.12</strong></td>
<td><strong>4.81</strong></td>
<td><strong>4.76 Hexane</strong></td>
</tr>
</tbody>
</table>

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

\(^2\)PM\(_{2.5}\) listed is direct PM\(_{2.5}\).

\(^3\)Single highest source-wide HAP - Hexane

\(^*\)Fugitive HAP emissions are always included in the source-wide emissions.

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

The source opted to take PM10 and PM2.5 limits in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable and PM limits in order to render the requirements 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) and 326 IAC 2-8 (FESOP), for more information regarding the limits.

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

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

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

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

(a) The natural gas emergency generator, identified as EmGen 3 is subject to the New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines, 40 CFR 60, Subpart JJJJ because they are stationary spark ignition (SI) internal combustion engines that commenced construction after the applicability date of June 12, 2006. The emission unit subject to this rule is as follows:

1. One (1) Natural Gas Emergency Generator, identified as EmGen3, manufactured in 2020 and approved in 2021 for constructed, rated at 338 hp.

This engine is subject to the following portions of 40 CFR 60, Subpart JJJJ:

1. 40 CFR 60.4230(a)(4)(iv), (6)
2. 40 CFR 60.4233(e)
3. 40 CFR 60.4234
4. 40 CFR 60.4237(b)
5. 40 CFR 60.4243(b), (d)(1), (d)(2)(i), (d)(3), (e), and (f)
6. 40 CFR 60.4245(a), (e)
7. 40 CFR 60.4246
8. 40 CFR 60.4248
9. Table 1 to 40 CFR 60, Subpart JJJJ
10. Table 3 to 40 CFR 60, Subpart JJJJ

On May 4, 2016, the U.S. Court of Appeals for the D.C. Circuit issued a mandate vacating paragraphs 40 CFR 60.4243(d)(2)(ii) - (iii) of NSPS Subpart JJJJ. Therefore, these paragraphs no longer have any legal effect and any engine that is operated for purposes specified in these paragraphs becomes a non-emergency engine and must comply with all applicable requirements for a non-emergency engine.

For additional information, please refer to the USEPA’s Guidance Memo:

Since the federal rule has not been updated to remove these vacated requirements, the text below shows the vacated language as strikethrough text. At this time, IDEM is not making any changes to the permit’s attachment due to this vacatur. However, the permit will not reference the vacated requirements, as applicable.

40 CFR 60.4243(d)(2) You may operate your emergency stationary ICE for any combination of the purposes specified in paragraphs (d)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (d)(3) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (d)(2).

(i) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.

(ii) Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation
(NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(iii) Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(a) The natural gas emergency generator, identified as EmGen 3 is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ and 326 IAC 20-82 because it is a stationary reciprocating internal combustion engines (RICE) located at an area source of HAPs that commenced construction after June 12, 2006, the applicability date of this rule. The emission unit subject to this rule is as follows:

(1) One (1) Natural Gas Emergency Generator, identified as EmGen3, manufactured in 2020 and approved in 2021 for constructed, rated at 338 hp.

This engine is subject to the following portions of 40 CFR 63, Subpart ZZZZ:

(1) 40 CFR 63.6580
(2) 40 CFR 63.6585(c)
(3) 40 CFR 63.6590(a)(2)(iii)
(4) 40 CFR 63.6595 (a)(7)
(5) 40 CFR 63.6665
(6) 40 CFR 63.6670
(7) 40 CFR 63.6675
(8) Table 8 to Subpart ZZZZ of Part 63

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

Compliance Assurance Monitoring (CAM):

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

State Rule Applicability

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

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

The source-wide PM emission is currently limited to a total of 40.07 pounds/hour, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide PM PTE to an equivalent of 226.34 tons/year. Thus, render the requirements of PSD, 326 IAC 2-2 not applicable to the source. However, with the PM PTE of 138.20 tons per year from the new equipment proposed in this Significant Permit Revision 085-43740-00132, including the existing saws unaccounted for added to the current PM limit of 226.34 tons/year will result in exceedance of 250 tons/year. Therefore, the existing
PSD limits have been adjusted to remain a minor source under PSD, 326 IAC 2-2, with the dust collectors operating well below each design control efficiency of 99%.

**Current PSD Minor Source Limits:**

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

(a) The PM emissions from the dust collectors controlling the Bldg 5A Machining Process, shall not exceed 9.25 lbs per hour.

(b) The PM emissions from the dust collectors controlling the Aluminium Frame operations, shall not exceed 21.82 lbs per hour.

(c) The PM emissions from the dust collectors controlling the Powder Coating EU003, shall not exceed 9.0 lbs per hour.

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

**Revised PSD Minor Source Limits:**

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

(a) The total PM emissions from Building 1 extruder saws, each controlled by a dedicated baghouse, shall not exceed 0.57 pounds per hour.

(b) The total PM emissions from the dust collector, identified as ID 007-1 controlling forty (40) extruder saws at Bldg 7, shall not exceed 3.64 pounds per hour.

(b) The PM emissions from the dust collector, identified as ID 001-6 controlling the twenty-three (23) machining units at Bldg 5A, shall not exceed 4.63 pounds per hour.

(c) The PM emissions from the dust collector, identified as ID-001-4 controlling nineteen (19) machining units at Bldg 5B, shall not exceed 4.02 pounds per hour.

(d) The PM emissions from the dust collectors, identified as ID-008-1 controlling twelve (12) machining units at Bldg 8, shall not exceed 2.42 pounds per hour.

(e) The PM emissions from the dust collectors, identified as ID-008-2 controlling twelve (12) machining units at Bldg 8, shall not exceed 2.42 pounds per hour.

(f) The PM emissions from the dust collector, identified as ID 002-1 controlling the Aluminium Frame operations, identified as EU002 shall not exceed 21.82 pounds per hour.

(g) The PM emissions from the dust collector, identified as ID-006-1 controlling the Powder Coating, identified as EU003, shall not exceed 9.0 pounds per hour.

Compliance with these limits, combined with the potential to emit of PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than two hundred fifty (250) tons per year, and shall render the requirements of 326 IAC 2-2 (PSD), not applicable.
**326 IAC 2-8-4 (FESOP)**
The source-wide PM10 and PM2.5 emission are currently limited to less than 100 tons per year, each. However, previous permits overlooked the emissions from the existing eighteen (18) extruder saws. Considering the PM10 and PM2.5 emissions from the existing 18 extruder saws plus the PM10 and PM2.5 emissions from the new equipment proposed in this Significant Permit Revision 085-43740-00132, will result in exceedance of 100 tons/year. Therefore, the current PM10 and PM2.5 FESOP limits have been adjusted to keep the PTE less than 100 tons per year.

**Current FESOP Limits:**

Pursuant to 326 IAC 2-8-4 (FESOP) and to render the requirements of 326 IAC 2-7 not applicable, the source shall comply with the following:

(a) The PM-10 emissions from the dust collectors controlling the Aluminium Frame operations, shall not exceed 7.0 lbs per hour, each.

(b) The PM-2.5 emissions from the dust collectors controlling the Aluminium Frame operations, shall not exceed 3.12 lbs per hour, each.

(c) The PM-10 emissions from the dust collectors controlling the Powder Coating Operations, shall not exceed 4.86 lbs per hour, each.

(d) The PM-2.5 emissions from the dust collectors controlling the Powder Coating Operations shall not exceed 3.51 lbs per hour, each.

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

**Revised FESOP Limits:**

(a) The total PM10 emissions from Building 1 extruder saws, each controlled by a dedicated baghouse, exhausting indoor shall not exceed 0.60 pounds per hour.

(b) The total PM10 emissions from Building 1 extruder saws, each controlled by a dedicated baghouse shall not exceed 0.30 pounds per hour.

(c) The total PM10 emissions from from the dust collector, identified as ID 007-1 controlling forty (40) extruder saws at Bldg 7, shall not exceed 3.88 pounds per hour.

(d) The total PM2.5 emissions from from the dust collector, identified as ID 007-1 controlling forty (40) extruder saws at Bldg 7, shall not exceed 0.44 pounds per hour.

(e) The PM10 emissions from the dust collector, identified as ID 002-1 controlling the Aluminium Frame operations, identified as EU002 shall not exceed 7.0 pounds per hour.

(f) The PM-2.5 emissions from the dust collectors controlling the Aluminium Frame operations, shall not exceed 3.12 lbs per hour.

(g) The PM10 emissions from the dust collector, identified as ID-006-1 controlling the Powder Coating, identified as EU003, shall not exceed 4.86 pounds per hour.

(h) The PM-2.5 emissions from the dust collectors controlling the Powder Coating Operations shall not exceed 3.51 lbs per hour.
Compliance with these limits, combined with the potential to emit of PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than one hundred (100) tons per year, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The new emission units will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

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

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

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The natural gas-fired ovens, heaters and emergency engine are not subject to 326 IAC 6-2 because they are not sources of indirect heating.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the following emission units at the source have been limited as follows:

<table>
<thead>
<tr>
<th>Operation</th>
<th>Process Weight (ton/hour)</th>
<th>PM Limit (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Building 5A Plastic Machining</td>
<td>4.42</td>
<td>11.09</td>
</tr>
<tr>
<td>Building 5B Plastic Machining</td>
<td>1.34</td>
<td>4.99</td>
</tr>
<tr>
<td>Building 4 Plastic Machining</td>
<td>0.38</td>
<td>2.16</td>
</tr>
<tr>
<td>Building 1 Design Center</td>
<td>0.19</td>
<td>1.36</td>
</tr>
<tr>
<td>Aluminum Framing (sanding)</td>
<td>0.30</td>
<td>1.84</td>
</tr>
<tr>
<td>Powder Coating Operations</td>
<td>0.02</td>
<td>0.55</td>
</tr>
<tr>
<td>Building 6 Plastic Machining</td>
<td>1.92</td>
<td>6.35</td>
</tr>
</tbody>
</table>

In this SPR 085-43740-00132 these emission units have been revised to include the addition of machining equipment to existing Building as follows:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Process Weight Rate (lb/hr)</th>
<th>Process Weight Rate (tons/hr)</th>
<th>PM Emissions Uncontrolled (lb/hr)</th>
<th>326 IAC 6-3-2 applicable Limit (lb/hr)</th>
<th>Emissions Controlled Limit (lb/hr)</th>
<th>DC ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plastics Extrusion, 1-18 (Building 1)</td>
<td>9,000</td>
<td>4.50</td>
<td>0.43</td>
<td>N</td>
<td>NA</td>
<td>ID 001-1</td>
</tr>
<tr>
<td>Plastic Extrusion, 19-44 (Building 7)</td>
<td>13,000</td>
<td>6.50</td>
<td>0.62</td>
<td>N</td>
<td>NA</td>
<td>I 007-01</td>
</tr>
<tr>
<td>23 Plastics Machining Process (Building 5A)</td>
<td>8,832</td>
<td>4.42</td>
<td>18.51</td>
<td>Y</td>
<td>11.09</td>
<td>ID 001-6</td>
</tr>
<tr>
<td>19 Plastics Machining Process (Building 5B)</td>
<td>7,296</td>
<td>3.65</td>
<td>15.29</td>
<td>Y</td>
<td>9.76</td>
<td>ID-001-4</td>
</tr>
</tbody>
</table>
Pursuant to 326 IAC 6-3-1(b)(14), the plastic extruders were previously determined to be exempt from 326 IAC 6-3 because each emission unit emits less than 0.551 pounds per hour.

The eighteen (18) Bldg 1 extrusion saws and forty (40) Bldg 7 extrusion saws are exempt from 326 IAC 6-3 because each emission unit emits less than 0.551 pounds per hour.

The Insignificant Activity- Plastics Machining Process (Design Center) has been determined to not be subject to 326 IAC 6-3-2, since it is not a manufacturing process. Instead, it is used to make prototype furniture on as needed in the design center and only used for demonstration.

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:

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

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

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

\[ E = 55.0P^{0.11} - 40 \]

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

The dust collectors shall be in operation at all times the 23 CNC for Plastics Machining Process (Building 5A), 19 CNC for Plastics Machining Process (Building 5B), Aluminum Framing (sanding) (Building 4), the Powder Coating Operation (Building 4) and 24 Plastic Machining (Building 8) in order to comply with the unit’s respective PM limit.

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

The natural gas-fired ovens, heaters and emergency engine are not subject to the requirements of 326 IAC 6-3, because as defined in 326 IAC 1-2-59, process weight does not include liquid and gaseous fuel.

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

The proposed ten (10) plastic extruders are not subject to the requirements of 326 IAC 8-1-6 because each unlimited VOC potential emissions of 0.077 tons/year are well less than twenty-five (25) tons per year.
Compliance Determination and Monitoring Requirements

(a) There are no Compliance Determination Requirements applicable to this revision:

Testing Requirements:

Testing is not required for the dust collectors associated with the machining units at Bldg 5A, machining units at Bldg 5B, machining units at Bldg 8 because the dust collectors are required to operate well below each design control efficiency of 99% to keep the source remain a PSD minor source.

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

<table>
<thead>
<tr>
<th>Control Device/Process</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>New Building 8 – 24 CNC and Saws Machining Operations–12 units controlled by Dust Collector, ID 008-1 and 12 units controlled by Dust Collector, ID 008-2</td>
<td>Visible emission notations</td>
<td>Daily</td>
<td>Verify whether emissions are normal or abnormal</td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the Dust Collectors, ID 008-1 and ID 008-2 each controlling a group of twelve (12) machining units at Building 8 must operate properly to assure compliance with the PSD Minor PM limits, under 326 IAC 2-2.

Proposed Changes

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

(a) Section A.2, Section A.3, Section D.1 and Sections E.1 and E.2 have been revised to include the new emission units proposed in this SPR085-43740-00132.

(b) Condition D.1.1 has been revised to clarify that the PM10 emission limit for the aluminum operation is a total limit and not for each control.

(c) Condition E.1.2 in Sections E.1 has been revised to delete the section of the federal rule, 40 CFR 60, Subpart JJJJ vacated by the U.S. Court of Appeals for the D.C. Circuit.

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

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

**************

(b) One (1) plastic product manufacturing line EU007, located in Building 7, approved in 2019 for construction, approved in 2020 for modification, consisting of the following:

**************

(5) Twenty-four (24) plastic extruders, identified as Extruders 35 through 58, approved in 2021 for construction, each with a capacity of 500 pounds per hour, with a total maximum extruding capacity of 12,000 pounds per hour, equipped with a dust collector for particulate control, identified as ID-007-1 and exhausting to stack 007-1.

(6) Sawing operations following each Extruders 35 through 58 to size plastic timber, approved in 2021 for construction, with a total maximum capacity of
processing 12,000 pounds per hour, using a dust collector, identified as ID-007-1 for particulate control and exhausting to stack 007-1.

(c) Two (2) machining operations, constructed in 2018, located in Building 5, and consisting of the following:

*************************************************************

(2) Building 5B - Machining operations consisting of the following:

*************************************************************

(C) Twelve (12) CNC machines and sawing, approved in 2021 for construction, with a maximum total capacity of processing 4,608 pounds per hour of raw plastic timber controlled by existing dust collector for PM control, identified as control equipment ID-001-4, exhausting through stack 72.

*************************************************************

(f) One (1) machining operation, approved in 2021 for construction at new Building 8, consisting of the following:

(1) Twenty-four (24) CNC machines and sawing, with a maximum total capacity of processing 9,216 pounds per hour of raw plastic timber. PM emissions from twelve (12) CNC machines and saws are controlled by dust collector, identified as ID-008-1, exhausting through stack 81. PM emissions from the other twelve (12) CNC machines and saws are controlled by dust collector, identified as ID-008-2, exhausting through stack 82.

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

This stationary source also includes the following insignificant activities:

*************************************************************

(p) Twenty (20) natural-gas-fired combustion units, consisting of the following:

(1) Five (5) Forced Air Thermocyclers, each with maximum heat input of 720,000 Btu/hour (total of 3.6 MMBtu/hour).

(2) Four (4) Forced Air Roof Top HVAC units, each with maximum heat input of 300,000 Btu/hour (total of 1.20 MMBtu/hour).

(3) Four (4) Tube Heaters in the ceiling, each with maximum heat input of 75,000 Btu/hour (total of 0.30 MMBtu/hour).

(4) Five (5) Forced Air, each with maximum heat input of 100,000 Btu/hour (total of 0.50 MMBtu/hour).

(5) Two (2) Ovens, each with maximum heat input of 1,000,000 Btu/hour (total of 2.0 MMBtu/hour).

(q) One (1) natural gas-fired emergency generator, identified as EmGen3, manufactured in 2020 and approved in 2021 for constructed, rated at 338 hp.

[Under 40 CFR 60, Subpart JJJJ, EmGen3, is an affected facility.]
[Under 40 CFR 63, Subpart ZZZZ, EmGen2, is an affected facility.]
SECTION D.1 Changes:

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(b) One (1) plastic product manufacturing line EU007, located in Building 7, approved in 2019 for construction, approved in 2020 for modification, consisting of the following:

****************************
(b) One (1) plastic product manufacturing line EU007, located in Building 7, approved in 2019 for construction, approved in 2020 for modification, consisting of the following:

(5) Twenty-four (24) plastic extruders, identified as Extruders 35 through 58, approved in 2021 for construction, each with a capacity of 500 pounds per hour, with a total maximum extruding capacity of 12,000 pounds per hour, equipped with a dust collector for particulate control, identified as ID-007-1 and exhausting to stack 007-1.

(6) Sawing operations following each Extruders 35 through 58 to size plastic timber, approved in 2021 for construction, with a total maximum capacity of processing 12,000 pounds per hour, using a dust collector, identified as ID-007-1 for particulate control and exhausting to stack 007-1.

(c) Two (2) machining operations, constructed in 2018, located in Building 5, and consisting of the following:

****************************
(c) Two (2) machining operations, constructed in 2018, located in Building 5, and consisting of the following:

(2) Building 5B - Machining operations consisting of the following:

****************************
(2) Building 5B - Machining operations consisting of the following:

(C) Twelve (12) CNC machines and sawing, approved in 2021 for construction, with a maximum total capacity of processing 4,608 pounds per hour of raw plastic timber controlled by existing dust collector for PM control, identified as control equipment ID-001-4, exhausting through stack 72.

****************************
(f) One (1) machining operation, approved in 2021 for construction at new Building 8, consisting of the following:

****************************
(f) One (1) machining operation, approved in 2021 for construction at new Building 8, consisting of the following:

(1) Twenty-four (24) CNC machines and sawing, with a maximum total capacity of processing 9,216 pounds per hour of raw plastic timber. PM emissions from twelve (12) CNC machines and saws are controlled by dust collector, identified as ID-008-1, exhausting through stack 81. PM emissions from the other twelve (12) CNC machines and saws are controlled by dust collector, identified as ID-008-2, exhausting through stack 82.

****************************
(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)
Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 FESOP Limits [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP) and to render the requirements of 326 IAC 2-7 not applicable, the source shall comply with the following:

(a) The PM-10 emissions from the dust collectors controlling the Aluminium Frame operations, shall not exceed 7.0 lbs per hour, each.
(b) The PM-2.5 emissions from the dust collectors controlling the Aluminium Frame operations, shall not exceed 3.12 lbs per hour, each.
(c) The PM-10 emissions from the dust collectors controlling the Powder Coating Operations, shall not exceed 4.86 lbs per hour, each.
(d) The PM-2.5 emissions from the dust collectors controlling the Powder Coating Operations shall not exceed 3.51 lbs per hour, each.
(a) The total PM10 emissions from Building 1 extruder saws, each controlled by a dedicated baghouse, shall not exceed 0.60 pounds per hour.
(b) The total PM10 emissions from Building 1 extruder saws, each controlled by a dedicated baghouse shall not exceed 0.30 pounds per hour.
(c) The total PM10 emissions from from the dust collector, identified as ID 007-1 controlling forty (40) extruder saws at Bldg 7, shall not exceed 3.88 pounds per hour.
(d) The total PM2.5 emissions from from the dust collector, identified as ID 007-1 controlling forty (40) extruder saws at Bldg 7, shall not exceed 0.44 pounds per hour.
(e) The PM10 emissions from the dust collector, identified as ID 002-1 controlling the Aluminium Frame operations, identified as EU002 shall not exceed 7.0 pounds per hour.
(f) The PM-2.5 emissions from the dust collectors controlling the Aluminium Frame operations, shall not exceed 3.12 lbs per hour,
(g) The PM10 emissions from the dust collector, identified as ID-006-1 controlling the Powder Coating, identified as EU003, shall not exceed 4.86 pounds per hour.
(h) The PM-2.5 emissions from the dust collectors controlling the Powder Coating Operations shall not exceed 3.51 lbs per hour.

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

D.1.2 Prevention of Significant Deterioration (PSD) Minor Limits [326 IAC 2-2]

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

(a) The PM emissions from the dust collectors controlling the Bldg 5A Machining Process, shall not exceed 9.25 lbs per hour.
(b) The PM emissions from the dust collectors controlling the Aluminium Frame operations, shall not exceed 21.82 lbs per hour.

(c) The PM emissions from the dust collectors controlling the Powder Coating EU003, shall not exceed 9.0 lbs per hour.

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

(a) The total PM emissions from Building 1 extruder saws, each controlled by a dedicated baghouse, shall not exceed 0.57 pounds per hour.

(b) The total PM emissions from from the dust collector, identified as ID 007-1 controlling forty (40) extruder saws at Bldg 7, shall not exceed 3.64 pounds per hour.

(b) The PM emissions from the dust collector, identified as ID 001-6 controlling the twenty-three (23) machining units at Bldg 5A, shall not exceed 4.63 pounds per hour.

(c) The PM emissions from the dust collector, identified as ID-001-4 controlling nineteen (19) machining units at Bldg 5B, shall not exceed 4.02 pounds per hour.

(d) The PM emissions from the dust collectors, identified as ID-008-1 controlling twelve (12) machining units at Bldg 8, shall not exceed 2.42 pounds per hour.

(e) The PM emissions from the dust collectors, identified as ID-008-2 controlling twelve (12) machining units at Bldg 8, shall not exceed 2.42 pounds per hour.

(f) The PM emissions from the dust collector, identified as ID 002-1 controlling the Aluminium Frame operations, identified as EU002 shall not exceed 21.82 pounds per hour.

(g) The PM emissions from the dust collector, identified as ID-006-1 controlling the Powder Coating, identified as EU003, shall not exceed 9.0 pounds per hour.

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

D.1.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the plastic machining, aluminum frame operations, and powder coating operations shall not exceed the following:

<table>
<thead>
<tr>
<th>Operation</th>
<th>Process-Weight (ton/hour)</th>
<th>PM Limit (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Building 5A Plastic Machining</td>
<td>4.42</td>
<td>11.09</td>
</tr>
<tr>
<td>Building 5B Plastic Machining</td>
<td>1.34</td>
<td>4.99</td>
</tr>
<tr>
<td>Building 4 Plastic Machining</td>
<td>0.38</td>
<td>2.16</td>
</tr>
<tr>
<td>Building 1 Design Center</td>
<td>0.19</td>
<td>1.36</td>
</tr>
<tr>
<td>Aluminum Framing (sanding)</td>
<td>0.30</td>
<td>1.84</td>
</tr>
<tr>
<td>Powder Coating Operations</td>
<td>0.02</td>
<td>0.55</td>
</tr>
<tr>
<td>Building 6 Plastic Machining</td>
<td>1.92</td>
<td>6.35</td>
</tr>
</tbody>
</table>
### Operation Table

<table>
<thead>
<tr>
<th>Operation</th>
<th>Process Weight (ton/hour)</th>
<th>PM Limit (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>23 Plastics Machining Process (Building 5A)</td>
<td>4.42</td>
<td>11.09</td>
</tr>
<tr>
<td>19 Plastics Machining Process (Building 5B)</td>
<td>3.65</td>
<td>9.76</td>
</tr>
<tr>
<td>Plastics Machining Process (Building 4)</td>
<td>0.38</td>
<td>2.16</td>
</tr>
<tr>
<td>Aluminum Framing (sanding) (Building 4)</td>
<td>0.30</td>
<td>1.84</td>
</tr>
<tr>
<td>Powder Coating Operations (Building 4)</td>
<td>0.02</td>
<td>0.28</td>
</tr>
<tr>
<td>10 Plastic Machining (Building 6)</td>
<td>1.92</td>
<td>6.35</td>
</tr>
<tr>
<td>24 Plastic Machining (Building 8)</td>
<td>4.6</td>
<td>11.40</td>
</tr>
</tbody>
</table>

The pound per hour limitation was calculated with the following equation:

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

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

The dust collectors for the emission units specified above, identified as control equipment, ID 001-6 (Bldg 5A), ID 002-1 (Al framing), ID 001-4 (Bldg 5B), and ID 003 (powder coating), ID 008-1 (Bldg 8) and ID-008-2 (Bldg 8) shall be in operation at all times each emission unit is in operation, in order to comply with this limit.

*******************************************************************************

**D.1.8 Visible Emissions Notations**

(a) Visible emission notations of dust collectors, identified as control equipment ID 001-6 (Bldg 5A), and ID 001-4 (Bldg 5B), ID-008-1 (Bldg 8) and ID-008-2 (Bldg 8), stack exhausts shall be performed once per day during normal daylight operations, when venting outdoors. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

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

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

*******************************************************************************
SECTION E.1 and SECTION E.2 Changes:

SECTION E.1 NSPS

Emissions Unit Description:

(a) (i) One (1) Natural Gas Emergency Generator (4-stroke lean-burn), identified as EmGen 1, permitted in 2017, with a maximum output of 192 hp, uncontrolled, and exhausting to stack NGS1.

[Under 40 CFR 60, Subpart JJJJ, EmGen1, is an affected facility.]

(b) (j) One (1) Natural Gas Emergency Generator (4-stroke lean-burn), identified as EmGen 2, approved in 2019 for construction, rated at 46 kW (156,959 Btu/hr) and using no control.

(q) One (1) natural gas-fired emergency generator, identified as EmGen3, manufactured in 2020 and approved in 2021 for constructed, rated at 338 hp.

[Under 40 CFR 60, Subpart JJJJ, EmGen3, is an affected facility.]

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

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E.1.2 Stationary Spark Ignition Internal Combustion Engines NSPS [326 IAC 12][40 CFR Part 60, Subpart JJJJ]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart JJJJ (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 12:

(a) EmGen 1

***************

(4) 40 CFR 60.4243(b), (d)(1), (d)(2)(l), (d)(3), (e), and (f)

(b) EmGen 2

(4) 40 CFR 60.4243(b), (d)(1), (d)(2)(l), (d)(3), (e), and (f)

(c) EmGen3

(1) 40 CFR 60.4230(a)(4)(iv), (6)
(2) 40 CFR 60.4233(e)
(3) 40 CFR 60.4234
(4) 40 CFR 60.4237(b)
(5) 40 CFR 60.4243(b), (d)(1), (d)(2)(l), (d)(3), (e), and (f)
(6) 40 CFR 60.4245(a), (e)
(7) 40 CFR 60.4246
(8) 40 CFR 60.4248
(9) Table 1 to 40 CFR 60, Subpart JJJJ
(10) Table 3 to 40 CFR 60, Subpart JJJJ
Emissions Unit Description:

(a) (i) One (1) Natural Gas Emergency Generator (4-stroke lean-burn), identified as EmGen 1, permitted in 2017, with a maximum output of 192 hp, uncontrolled, and exhausting to stack NGS1.

[Under 40 CFR 60, Subpart JJJJ, EmGen1, is an affected facility.]

(b) One (1) Natural Gas Emergency Generator (4-stroke lean-burn), identified as EmGen 2, approved in 2019 for construction, rated at 46 kW (156,959 Btu/hr) and using no control.

(q) One (1) natural gas-fired emergency generator, identified as EmGen3, manufactured in 2020 and approved in 2021 for constructed, rated at 338 hp.

[Under 40 CFR 63, Subpart ZZZZ, EmGen3 is an affected facility.]

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

E.2.2 Stationary Reciprocating Internal Combustion Engines NESHAP [40 CFR Part 63, Subpart ZZZZ][326 IAC 20-82]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 20-82, for the emission units listed above:

(1) 40 CFR 63.6580
(2) 40 CFR 63.6585
(3) 40 CFR 63.6590 (c)(1)
(4) 40 CFR 63.6595 (a)(7)
(5) 40 CFR 63.6665
(6) 40 CFR 63.6670
(7) 40 CFR 63.6675
(1) 40 CFR 63.6580
(2) 40 CFR 63.6585(c)
(3) 40 CFR 63.6590(a)(2)(iii)
(4) 40 CFR 63.6595 (a)(7)
(5) 40 CFR 63.6665
(6) 40 CFR 63.6670
(7) 40 CFR 63.6675
(8) Table 8 to Subpart ZZZZ of Part 63

Additional Changes

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

Condition B.24 - Annual Fee Payment of the permit has been revised as follows to include an updated phone number for the OAQ, Billing, Licensing, and Training Section:
B.24 Annual Fee Payment [326 IAC 2-1.1-7]

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-42308590 (ask for OAQ, Billing, Licensing, and Training Section) to determine the appropriate permit fee.

Condition C.8 has been revised to reflect the change in the rule cite.

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

*****

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

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

*****

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 February 8, 2021.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 085-43740-00132. The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Aida DeGuzman, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-4972 or (800) 451-6027, and ask for Aida DeGuzman or (317) 233-4972.

(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: https://www.in.gov/idem/airpermit/2358.htm; and the Citizens' Guide to IDEM on the Internet at: https://www.in.gov/idem/6900.htm.
<table>
<thead>
<tr>
<th>Emission Source (Location/Activity)</th>
<th>PM</th>
<th>PM-10</th>
<th>PM-2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAP</th>
<th>Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bldg 1 Plastic Extrusion (18 units)</td>
<td>1.18</td>
<td>1.28</td>
<td>1.30</td>
<td>0.03</td>
<td>0.38</td>
<td>1.52</td>
<td>1.53</td>
<td>1.53</td>
<td>1.53</td>
</tr>
<tr>
<td>Bldg 2 Plastic Extrusion (18 units)</td>
<td>0.12</td>
<td>1.20</td>
<td>1.20</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Bldg 3 Plastic Extrusion (20 units)</td>
<td>1.16</td>
<td>1.18</td>
<td>1.20</td>
<td>0.03</td>
<td>0.39</td>
<td>1.53</td>
<td>1.55</td>
<td>1.55</td>
<td>1.55</td>
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<tr>
<td>Bldg 4 Plastic Extrusion (20 units)</td>
<td>0.12</td>
<td>1.22</td>
<td>1.23</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Bldg 5 Plastic Extrusion (20 units)</td>
<td>0.62</td>
<td>0.64</td>
<td>0.66</td>
<td>0.02</td>
<td>0.04</td>
<td>0.20</td>
<td>0.21</td>
<td>0.21</td>
<td>0.21</td>
</tr>
<tr>
<td>Bldg 6 Plastic Extrusion (20 units)</td>
<td>0.12</td>
<td>1.16</td>
<td>1.18</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Bldg 7 Plastic Extrusion (20 units)</td>
<td>0.12</td>
<td>1.16</td>
<td>1.18</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Bldg 8 Plastic Extrusion (20 units)</td>
<td>0.12</td>
<td>1.16</td>
<td>1.18</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

*The Process washer for the powder coating does not emit any pollutants.*
## Uncontrolled PTE Summary

<table>
<thead>
<tr>
<th>Process</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>VOC</th>
<th>NOx</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bldg 7 Plastic Extrusion, ID 35-58 (24 Units)</td>
<td>2.52</td>
<td>2.52</td>
<td>2.52</td>
<td>--</td>
<td>1.86</td>
<td>0.00</td>
<td>0.65</td>
<td>1.86</td>
<td>1.86</td>
</tr>
<tr>
<td>Bldg 7 Plastic Saws (24)</td>
<td>8.74</td>
<td>9.32</td>
<td>1.05</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Bldg 5B Plastic Machining (12 Units)</td>
<td>42.29</td>
<td>3.88</td>
<td>1.63</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>New Bldg 8 Plastic Machining (24 Units)</td>
<td>84.59</td>
<td>7.76</td>
<td>3.27</td>
<td>--</td>
<td>--</td>
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<td>--</td>
<td>--</td>
</tr>
<tr>
<td>EmGen 3-Bldg 8</td>
<td>1.7E-05</td>
<td>2.1E-03</td>
<td>2.1E-03</td>
<td>1.3E-04</td>
<td>2.5E-02</td>
<td>8.8E-01</td>
<td>6.8E-02</td>
<td>0.02</td>
<td>0.01</td>
</tr>
<tr>
<td>Bldg 8-Natural gas Combustion Units (20 Units)</td>
<td>0.06</td>
<td>0.25</td>
<td>0.25</td>
<td>0.02</td>
<td>0.18</td>
<td>3.26</td>
<td>2.74</td>
<td>0.06</td>
<td>0.06</td>
</tr>
<tr>
<td>TOTAL UNCONTROLLED PTE</td>
<td>138.20</td>
<td>23.73</td>
<td>8.72</td>
<td>0.02</td>
<td>2.06</td>
<td>4.14</td>
<td>3.46</td>
<td>1.93</td>
<td>1.91</td>
</tr>
</tbody>
</table>

**Significant Permit Revision - under 326 IAC 2-8-11.1(f) -**

<table>
<thead>
<tr>
<th></th>
<th>≥ 25</th>
<th>≥ 25</th>
<th>≥ 25</th>
<th>≥ 25</th>
<th>≥ 25</th>
<th>≥100</th>
<th>≥ 25</th>
<th>≥ 10</th>
</tr>
</thead>
</table>

Company Name: Poly-Wood, LLC  
Address City IN Zip: 1001 W. Brooklyn Street, Syracuse, IN 46567  
Operating Permit No.: F 085-41789-00132  
SPR No.: 085-43740-00132  
Reviewer: Aida DeGuzman
Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Building 8 - 20 NG Combustion Units

Company Name: Poly-Wood, LLC
Address City IN Zip: 1001 W. Brooklyn Street, Syracuse, IN 46567
Operating Permit No.: F 085-41789-00132
SPR No.: 085-43740-00132
Reviewer: Aida DeGuzman

Potential

<table>
<thead>
<tr>
<th>Heat Input</th>
<th>HHV</th>
<th>Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td>Capacity</td>
<td>MMBtu</td>
<td>MMCF/yr</td>
</tr>
<tr>
<td>MMBtu/hr</td>
<td>MMscf</td>
<td></td>
</tr>
<tr>
<td>7.60</td>
<td>1020</td>
<td>65.3</td>
</tr>
</tbody>
</table>

### Pollutant

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>1.9</td>
<td>0.062</td>
</tr>
<tr>
<td>PM10*</td>
<td>7.6</td>
<td>0.248</td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>7.6</td>
<td>0.248</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.0196</td>
</tr>
<tr>
<td>NOx</td>
<td>100</td>
<td>3.26</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>0.179</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>2.74</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation.

### Methodology

All emission factors are based on normal firing.

**Potential Emission (tons/yr)**

\[
\text{Emission (tons/yr)} = \text{Throughput (MMCF/yr)} \times \text{Emission Factor (lb/MMCF)} / 2,000 \text{ lb}
\]

### HAPs Calculations

#### HAPs - Organics

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in MMcf</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.059</td>
<td>0.00</td>
<td>0.061</td>
</tr>
</tbody>
</table>

#### HAPs - Metals

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in MMcf</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td></td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

**Total HAPs 0.062**

Worst HAP 0.059

### Additional Information

- 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.
### Appendix A: Emission Calculations

**Reciprocating Internal Combustion Engines - Natural Gas**

**4-Stroke Lean-Burn (4SLB) Engines**

- **Company Name:** Poly-Wood, LLC
- **Address City IN Zip:** 1001 W. Brooklyn Street, Syracuse, IN 46567
- **Operating Permit No.:** F 085-41789-00132
- **SPR No.:** 085-43740-00132
- **Reviewer:** Aida DeGuzman

<table>
<thead>
<tr>
<th>Maximum Heat Input Capacity (MMBtu/hr)</th>
<th>0.86</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maximum Hours Operated per Year (hr/yr)</td>
<td>500</td>
</tr>
<tr>
<td>Potential Fuel Usage (MMBtu/yr)</td>
<td>430</td>
</tr>
<tr>
<td>High Heat Value (MMBtu/MMscf)</td>
<td>1020</td>
</tr>
<tr>
<td>Potential Fuel Usage (MMcf/yr)</td>
<td>0.42</td>
</tr>
</tbody>
</table>

#### Criteria Pollutants

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor (lb/MMBtu)</th>
<th>Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>7.71E-05</td>
<td>0.00002</td>
</tr>
<tr>
<td>PM10*</td>
<td>9.99E-03</td>
<td>0.00015</td>
</tr>
<tr>
<td>PM2.5*</td>
<td>9.99E-03</td>
<td>0.00013</td>
</tr>
<tr>
<td>SO2</td>
<td>5.88E-04</td>
<td>0.000215</td>
</tr>
<tr>
<td>NOx</td>
<td>4.08E+00</td>
<td>0.000215</td>
</tr>
<tr>
<td>VOC</td>
<td>1.18E-01</td>
<td>0.000013</td>
</tr>
<tr>
<td>CO</td>
<td>3.17E-01</td>
<td>0.00008</td>
</tr>
</tbody>
</table>

*PM emission factor is for filterable PM-10. PM10 emission factor is filterable PM10 + condensable PM. PM2.5 emission factor is filterable PM2.5 + condensable PM.

#### Hazardous Air Pollutants (HAPs)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor (lb/MMBtu)</th>
<th>Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acetaldehyde</td>
<td>8.36E-03</td>
<td>0.002</td>
</tr>
<tr>
<td>Acrolein</td>
<td>5.14E-03</td>
<td>0.001</td>
</tr>
<tr>
<td>Benzene</td>
<td>4.40E-04</td>
<td>0.000</td>
</tr>
<tr>
<td>Biphenyl</td>
<td>2.12E-04</td>
<td>0.000</td>
</tr>
<tr>
<td>1,3-Butadiene</td>
<td>2.67E-04</td>
<td>0.000</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>5.28E-02</td>
<td>0.011</td>
</tr>
<tr>
<td>Methanol</td>
<td>2.50E-03</td>
<td>0.001</td>
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<td>Hexane</td>
<td>1.10E-03</td>
<td>0.000</td>
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<tr>
<td>Toluene</td>
<td>4.08E-04</td>
<td>0.000</td>
</tr>
<tr>
<td>2,2,4-Trimethylpentane</td>
<td>2.50E-04</td>
<td>0.000</td>
</tr>
<tr>
<td>Xylene</td>
<td>1.84E-04</td>
<td>0.000</td>
</tr>
</tbody>
</table>

**Total** 0.02

HAP pollutants consist of the eleven highest HAPs included in AP-42 Table 3.2-2.

### Methodology

Emission Factors are from AP-42 (Supplement F, July 2000), Table 3.2-2

- **Potential Fuel Usage (MMBtu/yr) = [Maximum Heat Input Capacity (MMBtu/hr)] * [Maximum Hours Operating per Year (hr/yr)]**
- **Potential Emissions (tons/yr) = [Potential Fuel Usage (MMBtu/yr)] * [Emission Factor (lb/MMBtu)] / [2000 lb/ton]**

### Abbreviations

- PM = Particulate Matter
- NOx = Nitrous Oxides
- PM10 = Particulate Matter (<10 um)
- VOC = Volatile Organic Compounds
- SO2 = Sulfur Dioxide
- CO = Carbon Monoxide

---

**338 HP EmGen3-SPR43740**

**43740 Calcs.xlsx**
Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Building 8 - 20 Natural Gas Combustion Units

Company Name: Poly-Wood, LLC
Address City IN Zip: 1001 W. Brooklyn Street, Syracuse, IN 46567
Operating Permit No.: F 085-41789-00132
SPR No.: 085-43740-00132
Reviewer: Aida DeGuzman

<table>
<thead>
<tr>
<th>Potential</th>
<th>Heat Input</th>
<th>HHV</th>
<th>Throughput</th>
<th>Capacity</th>
<th>MMBtu/hr</th>
<th>MMSCF/hr</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>MMBtu</td>
<td>MMBtu/hr</td>
<td>MMSCF/hr</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7.50</td>
<td>1020</td>
<td>64.4</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>1.9</td>
<td>0.061</td>
</tr>
<tr>
<td>PM10*</td>
<td>7.6</td>
<td>0.245</td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>7.6</td>
<td>0.245</td>
</tr>
<tr>
<td>PM2.5*</td>
<td>0.6</td>
<td>0.0193</td>
</tr>
<tr>
<td>SO2</td>
<td>100</td>
<td>3.22</td>
</tr>
<tr>
<td>NOx</td>
<td>50</td>
<td>1.77</td>
</tr>
<tr>
<td>VOC</td>
<td>84</td>
<td>2.71</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of

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,
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 l

HAPS Calculations

<table>
<thead>
<tr>
<th>HAPs - Organics</th>
<th>Emission Factor in lb/MMcf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Benzene 2.1E-03</td>
<td>Dichlorobenzene 1.2E-03</td>
</tr>
<tr>
<td></td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HAPs - Metals</th>
<th>Emission Factor in lb/MMcf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Lead 5.0E-04</td>
<td>Cadmium 1.1E-03</td>
</tr>
<tr>
<td></td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

Methodology is the same as above

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter
### Plastic Machining - PM Emissions

#### Emission Limits

<table>
<thead>
<tr>
<th>Operation</th>
<th>Uncontrolled</th>
<th>Controlled</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>PM10</td>
<td>PM2.5</td>
</tr>
<tr>
<td><strong>FESOP and 326 UG C</strong></td>
<td><strong>FESOP and 326 UG C</strong></td>
<td><strong>FESOP and 326 UG C</strong></td>
</tr>
<tr>
<td>PM</td>
<td>PM10</td>
<td>PM2.5</td>
</tr>
<tr>
<td><strong>Emission Limits</strong></td>
<td><strong>Emission Limits</strong></td>
<td><strong>Emission Limits</strong></td>
</tr>
<tr>
<td>Before Revision</td>
<td>After Revision</td>
<td></td>
</tr>
</tbody>
</table>

#### Emissions Calculations

1. **Net Waste Material Collected** (lbs/hr) = Initial throughput (lbs/hr) - Final Product (lb/hr)
2. **Controlled** (tons/yr) = Uncontrolled (tons/yr) * (1 - Dust Collector Control Efficiency (%))
3. **Dust Collector Control Efficiency (%)** = 1 - (particle size collected (lb/hr) * particle sizing of the catch (%) * conversion (8760 hrs/yr) * conversion (ton/2000lbs))
4. **PM10, PM2.5, PM10 controlled, PM2.5 controlled**

#### CNC Operations - Emissions Results

<table>
<thead>
<tr>
<th>Machine Type</th>
<th>Bldg</th>
<th>CNC Mach</th>
<th>Throughput</th>
<th>Net Waste Collected (lbs/hr)</th>
<th>Total PM</th>
<th>PM10 (lbs/hr)</th>
<th>PM2.5 (lbs/hr)</th>
<th>PM10 (% of total PM)</th>
<th>PM2.5 (% of total PM)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Bldg 6</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Bldg 8</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Revised Emissions

<table>
<thead>
<tr>
<th>Machine Type</th>
<th>Bldg 1</th>
<th>Bldg 4</th>
<th>Bldg 5A</th>
<th>Bldg 5B</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PM10</strong></td>
<td>3.48</td>
<td>0.89</td>
<td>0.15</td>
<td>5.0</td>
<td>21.9</td>
</tr>
</tbody>
</table>

#### Revised Project Notes

- The total PM emitted from the 24 CNC will be divided between the 2 dust collectors to 3.38 lb/he each.
- The PM limit for the new 12 CNC and saws at Bldg 5B was calculated to be 5.88 lb/hr.
- The PM limit for the existing 12 CNC at Bldg 5B was calculated to be 2.14 lb/hr.

#### Emission Sources

- **Bldg 5A - 23 Machining**
- **Bldg 5B - SPR 43740**

#### Emission Limits

- **Bldg 5B Machining Process**
- **Bldg 4 Machining Process**
- **Bldg 6 Machining Process**
- **Bldg 8 - 24 CNC and saws**

#### Dust Collector

<table>
<thead>
<tr>
<th>Dust Collector</th>
<th>Bldg 6</th>
<th>Bldg 8</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PM10</strong></td>
<td>3.48</td>
<td>0.89</td>
<td>5.0</td>
</tr>
</tbody>
</table>

#### Revised PM Limits

- **Bldg 5B Machining Process**
- **Bldg 4 Machining Process**
- **Bldg 6 Machining Process**
- **Bldg 8 - 24 CNC and saws**

#### Revised Economic Impact

- The revised PM limits will have a significant impact on the production capacity.

#### Revised Note

- Since the CNC machines are the limiting factor for the production, therefore that their capacity defines the maximum production flow.
## Appendix A: Emissions Calculations

### Building 1 - Eighteen (18) Extrusion Line Saws

**Company Name:** Poly-Wood, LLC  
**Address City Zip:** 1001 W. Brooklyn Street, Syracuse, IN 46567  
**Operating Permit No.:** F 085-41789-00132  
**SPR No.:** 085-43740-00132  
**Reviewer:** Aida DeGuzman

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>Total Plastic Dust Collected (pound/hour)</th>
<th>Percent (%) PM Collected</th>
<th>Percent (%) PM10 Collected</th>
<th>Percent (%) PM2.5 Collected</th>
<th>Control Efficiency</th>
<th>PM PTE</th>
<th>PM10 PTE</th>
<th>PM2.5 PTE</th>
<th>PM PTE Limit</th>
<th>PM10 PTE Limit</th>
<th>PM2.5 PTE Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bldg 1</td>
<td>1.0</td>
<td>6.65</td>
<td>7.39</td>
<td>0.80</td>
<td>65.00%</td>
<td>1.62</td>
<td>1.72</td>
<td>0.19</td>
<td>7.08</td>
<td>7.55</td>
<td>0.85</td>
</tr>
<tr>
<td>TOTAL PTE</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>7.08</td>
<td>7.55</td>
<td>0.85</td>
<td>2.48</td>
<td>2.64</td>
<td>0.30</td>
</tr>
</tbody>
</table>

**Notes:**  
- Using de-rated control of 65% efficiency.  
- Each saw is exempt from 326 IAC 6-3-2 because each has a PM emissions <0.551 lbs/hour.

### METHODOLOGY

- Emission Rate before Controls (lb/hr) = dust collected (lb/hr) + dust emitted (lb/hr) x % of PM, PM10, PM2.5 from dust collected x no. of saws  
- Emission Rate After Controls (tons/yr) = Emission Rate before Controls (lb/hr) x 8760 hrs/yr x 2000 lb/ton  

Particle sizing from dust collected was performed on April 19, 2021 by RTI Laboratories.
### Building 7 - Forty (40) Extrusion Line Saws

**Company Name:** Poly-Wood, LLC  
**Address City IN Zip:** 1001 W. Brooklyn Street, Syracuse, IN 46567  
**Operating Permit No.:** F 085-41789-00132  
**SPR No.:** 085-43740-00132  
**Reviewer:** Aida DeGuzman

#### METHODOLOGY

Emission Rate before Controls (lb/hr) = dust collected (lb/hr) + dust emitted (lb/hr) x % of PM, PM10, PM2.5 from dust collected x no. of saws

Emission Rate After Controls (tons/yr) = Emission Rate before Controls (lb/hr) * 8760 hrs/yr ÷ 2000 lb/ton

Particle sizing from dust collected was performed on April 19, 2021 by RTI Laboratories.

Using de-rated control of 65%

Note: All 40 saws from Bldg 7 are controlled by 1 baghouse DC ID 007-1

Each saw is exempt from 326 IAC 6-3-2 because each has a PM emissions <0.551 lbs/hour.

<table>
<thead>
<tr>
<th>Unit ID</th>
<th>New 24 saws (35-58)-SPR43740</th>
<th>Existing 16 saws</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>UNCONTROLLED PTE (pounds/hour)</td>
<td>UNCONTROLLED PTE (TONS/YEAR)</td>
</tr>
<tr>
<td></td>
<td>Total Plastic Dust Collected (pound/hour)</td>
<td>Percent (%) PM Collected</td>
</tr>
<tr>
<td>Bldg 7</td>
<td>1.0</td>
<td>6.65</td>
</tr>
<tr>
<td>Bldg 7</td>
<td>1.0</td>
<td>6.65</td>
</tr>
<tr>
<td></td>
<td>TOTAL PTE</td>
<td></td>
</tr>
</tbody>
</table>

Limits, (lb/hour) 0.83 0.89 0.10

Notes:

Building 7: Each Extrusion Line, identified as Extruders 19-58, has a saw at the end of each line to cut the plastic lumber to 8 feet pieces. Each saw has a pipe that is directed to the external dust collector.

**UNCONTROLLED PTE (pounds/hour)**

**UNCONTROLLED PTE (TONS/YEAR)**

**LIMITED PTE (TONS/YEAR)**
### Appendix A: Emissions Calculations

**Plastic Machining - PM Emissions**

**Company Name:** Poly-Wood, LLC  
**Address City In Zip:** 1001 W. Brooklyn Street, Syracuse, IN 46567  
**Operating Permit No.:** F 085-41789-00132  
**SPR No.:** 085-43740-80132  
**Reviewer:** Aida DeGuzman

2019 Revision - one (1) new CNC and sawing  

<table>
<thead>
<tr>
<th>Bldg 4</th>
<th>Bldg 5A</th>
<th>Bldg 5B</th>
<th>Total Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>3</td>
<td>20</td>
<td>23</td>
</tr>
<tr>
<td>2</td>
<td>22</td>
<td>2</td>
<td>33</td>
</tr>
<tr>
<td>3</td>
<td>20</td>
<td>3</td>
<td>23</td>
</tr>
<tr>
<td>4</td>
<td>20</td>
<td>3</td>
<td>23</td>
</tr>
<tr>
<td>5</td>
<td>20</td>
<td>3</td>
<td>23</td>
</tr>
</tbody>
</table>

### CNC operations - Mass Balanced Results as of June 27, 2019 - Source Provided

<table>
<thead>
<tr>
<th>Bldg</th>
<th>CNC Mach</th>
<th>% CNC</th>
<th>Initial Throughput (lbs/hr)</th>
<th>Final Product (lbs/hr)</th>
<th>Net Waste Material Collected (lbs/hr)</th>
<th>% Particle Sizing chart From Sizing analysis 6/27/2018</th>
<th>AP 42 Size/wt estimate using wood shop info after baghouse</th>
</tr>
</thead>
</table>
| 5B   | 89.6     | 9.6   | 211.8                       | 90.8                   | 120.1                                 | 100% - 2.6 pm & less                             | 0.04% PM  
| 5A   | 72.5     | 27.5  | 207.6                       | 83.9                   | 123.7                                 | 100% - 2.6 pm & less                             | 0.04% PM  
| 5B   | 100%     | 0%    | 207.6                       | 83.9                   | 123.7                                 | 100% - 2.6 pm & less                             | 0.04% PM  

### Hardfield tools including routing tables

<table>
<thead>
<tr>
<th>Bldg 1 Design center</th>
<th>Particle size collected</th>
<th>Decision efficiency</th>
<th>Controlled (ton/year)</th>
<th>Emission Limits</th>
<th>Deposition Materials PM (mg/d)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0.80</td>
<td>0.07</td>
<td>0.03</td>
<td>0.32</td>
<td>1.76</td>
</tr>
<tr>
<td></td>
<td>0.32</td>
<td>1.64</td>
<td>1.04</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

1 The machining process includes both the sawing and CNC operations, each with emissions exhausted to the same dust collector.  
2 The design center is not part of a manufacturing process line. Prototype furniture is made as needed in the design center and only used for demonstration. The worst case annual emissions are listed above. The product flow is dependent on the number of CNC machines in each building. Building 1 has the design studio and the production there varies as to the degree of product development is occurring. All extrusion occurs in another area of building 1.  
3 Router table waste is not captured and treated as fugitive.
## Appendix A: Emissions Calculations

**Building 7 - extruders19-26**

**Plastic Extrusion**

---

**Company Name:** Poly-Wood, LLC  
**Address City IN Zip:** 1001 W. Brooklyn Street, Syracuse, IN 46567  
**Operating Permit No.:** F 085-41789-00132  
**SPR No.:** 085-43740-00132  
**Reviewer:** Aida DeGuzman

---

### Process Emission Calculations

<table>
<thead>
<tr>
<th>Process</th>
<th>Total Maximum Capacity (lb/hr)</th>
<th>Maximum Capacity (tons per hr)</th>
<th>PM/PM10/PM2.5 Emission Factor (lb/ton)</th>
<th>PM/PM10/PM2.5 Potential to Emit (tons per year)</th>
<th>VOC Emission Factor (lb/ton)</th>
<th>VOC/HAP - Hexane Potential to Emit (tons per year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plastic Extrusion (8 units)</td>
<td>4000</td>
<td>2.00</td>
<td>0.0958</td>
<td>0.84</td>
<td>0.0706</td>
<td>0.62</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Usage Rate**

<table>
<thead>
<tr>
<th>Process</th>
<th>Usage Rate (lb/hr)</th>
<th>Emission Factor</th>
<th>Potential to Emit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blowing Agent</td>
<td>38</td>
<td>NOx (0%)</td>
<td>NOx (tons/yr)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>CO (0.13)</td>
<td>CO (tons/yr)</td>
</tr>
</tbody>
</table>

**Methodology**

Plastic Extrusion emission factors based on "Plastic Production and Products Manufacturing", Michigan DEQ

Plastic Extrusion Potential to Emit (tons/yr) = Maximum Capacity (tons/hr) * EF (lb/ton) * conversion (8760 hr/yr) * conversion (ton/2000 lb)

Blowing Agent Potential to Emit (tons/yr) = Usage Rate (lb/hr) * EF (%) * conversion (8760 hr/yr) * conversion (ton/2000 lb)

The emission factor was corrected from 0.0985 to 0.0958
Appendix A: Emissions Calculations
Building 7 - extruders 27 - 34
Plastic Extrusion

Company Name: Poly-Wood, LLC
Address City IN Zip: 1001 W. Brooklyn Street, Syracuse, IN 46567
Operating Permit No.: F 085-41789-00132
SPR No.: 085-43740-00132
Reviewer: Aida DeGuzman

<table>
<thead>
<tr>
<th>Process</th>
<th>Total Maximum Capacity (lb/hr)</th>
<th>Maximum Capacity (tons per hr)</th>
<th>PM/PM10/PM2.5 Emission Factor (lb/ton)</th>
<th>PM/PM10/PM2.5 Potential to Emit (tons per year)</th>
<th>VOC Emission Factor (lb/ton)</th>
<th>VOC/HAP - Hexane Potential to Emit (tons per year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plastic Extrusion (8 units)</td>
<td>4000</td>
<td>2.00</td>
<td>0.0958</td>
<td>0.84</td>
<td>0.0706</td>
<td>0.62</td>
</tr>
</tbody>
</table>

Blowing Agent Potential to Emit (tons/yr) = Usage Rate (lb/hr) * EF (%) * conversion (8760 hr/yr) * conversion (ton/2000 lb)

Methodology
Plastic Extrusion emission factors based on "Plastic Production and Products Manufacturing", Michigan DEQ
Plastic Extrusion Potential to Emit (tons/yr) = Maximum Capacity (tons/hr) * EF (lb/ton) * conversion (8760 hr/yr) * conversion (ton/2000 lb)

the emission factor was corrected from 0.0985 to 0.0958
### Appendix A: Emissions Calculations

**SPR 085-43740-00132**  
**Bldg 7 Plastic Extrusion -35-58**

**Company Name:** Poly-Wood, LLC  
**Address City IN Zip:** 1001 W. Brooklyn Street, Syracuse, IN 46567  
**Operating Permit No.:** F 085-41789-00132  
**SPR No.:** 085-43740-00132  
**Reviewer:** Aida DeGuzman

#### Process

<table>
<thead>
<tr>
<th>Process</th>
<th>Total Maximum Capacity (lb/hr)</th>
<th>Maximum Capacity (tons per hr)</th>
<th>PM/PM10/PM2.5 Emission Factor (lb/ton)</th>
<th>PM/PM10/PM2.5 Potential to Emit (tons per year)</th>
<th>VOC Emission Factor (lb/ton)</th>
<th>VOC/HAP - Hexane Potential to Emit (tons per year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plastic Extrusion (24 units)</td>
<td>12000</td>
<td>6.00</td>
<td>0.0958</td>
<td>2.52</td>
<td>0.0706</td>
<td>1.86</td>
</tr>
</tbody>
</table>

- **Usage Rate:** 0.57 lb/hr PM

<table>
<thead>
<tr>
<th>Process</th>
<th>Usage Rate</th>
<th>Emission Factor</th>
<th>Potential to Emit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blowing Agent</td>
<td>114</td>
<td>0</td>
<td>0.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>0.13</td>
<td>0.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>0.65</td>
</tr>
</tbody>
</table>

#### Methodology

Plastic Extrusion emission factors based on "Plastic Production and Products Manufacturing", Michigan DEQ

Plastic Extrusion Potential to Emit (tons/yr) = Maximum Capacity (tons/hr) * EF (lb/ton) * conversion (8760 hr/yr) * conversion (ton/2000 lb)

Blowing Agent Potential to Emit (tons/yr) = Usage Rate (lb/hr) * EF (%) * conversion (8760 hr/yr) * conversion (ton/2000 lb)

The emission factor was corrected from 0.0985 to 0.0958.
Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Building 7 - 6 New Heating Units

Company Name: Poly-Wood, LLC
Address City IN Zip: 1001 W. Brooklyn Street, Syracuse, IN 46567
Operating Permit No.: F 085-41789-00132
SPR No.: 085-43740-00132
Reviewer: Aida DeGuzman

<table>
<thead>
<tr>
<th>Building</th>
<th>MMBtu</th>
<th>Potential Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bldg. 1</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Bldg. 2</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Bldg. 3</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Bldg. 4</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Bldg. 5</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Bldg. 6</td>
<td>0.00</td>
<td>3.64</td>
</tr>
<tr>
<td>Bldg. 7</td>
<td>3.64</td>
<td>Total</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>1.9</td>
<td>0.030</td>
</tr>
<tr>
<td>PM10*</td>
<td>7.6</td>
<td>0.119</td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>7.6</td>
<td>0.119</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.0094</td>
</tr>
<tr>
<td>NOx</td>
<td>100 <strong>see below</strong></td>
<td>1.56</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>0.086</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>1.31</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is filterable and condensable PM2.5 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation.

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of ft³

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.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb

HAPs Calculations

**HAPs - Organics**

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Benzene 2.1E-03</th>
<th>Dichlorobenzene 1.2E-03</th>
<th>Formaldehyde 7.5E-02</th>
<th>Hexane 1.8E+00</th>
<th>Toluene 3.4E-03</th>
<th>Total Organics 0.029</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potential Emission in tons/yr</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.028</td>
<td>0.00</td>
<td>0.029</td>
</tr>
</tbody>
</table>

**HAPs - Metals**

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Lead 5.0E-04</th>
<th>Cadmium 1.1E-03</th>
<th>Chromium 1.4E-03</th>
<th>Manganese 3.8E-04</th>
<th>Nickel 2.1E-03</th>
<th>Total Metals 0.00</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potential Emission in tons/yr</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

**Total HAPs 0.029**

**Worst HAP 0.028**

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...
## Appendix A: Emissions Calculations
### Natural Gas Combustion Only
#### MM BTU/HR <100
#### Source-wide Heating Units - Prior to MPR 43009

**Company Name:** Poly-Wood, LLC  
**Address City IN Zip:** 1001 W. Brooklyn Street, Syracuse, IN 46567  
**Operating Permit No.:** F 085-41789-00132  
**SPR No.:** 085-43740-00132  
**Reviewer:** Aida DeGuzman

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>1.9</td>
<td>0.170</td>
</tr>
<tr>
<td>PM10</td>
<td>7.6</td>
<td>0.678</td>
</tr>
<tr>
<td>direct PM2.5</td>
<td>7.6</td>
<td>0.678</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.0535</td>
</tr>
<tr>
<td>NOx</td>
<td>100</td>
<td>8.92</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>0.491</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>7.50</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is filterable and condensable PM2.5 combined.

**Emission Factors for NOx:** Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation

### 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,

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb

### HAPs Calculations
#### HAPs - Organics

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCy</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td>0.168</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>0.00</td>
<td>0.00</td>
<td>0.01</td>
<td>0.161</td>
<td>0.00</td>
<td>0.168</td>
</tr>
</tbody>
</table>

#### HAPs - Metals

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCy</td>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td>0.00</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

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
<table>
<thead>
<tr>
<th>Asset #</th>
<th>Location</th>
<th>Use Type</th>
<th>Category</th>
<th>Input BTU/hr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Building 1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Building 2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Building 3</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Building 4</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Building 5</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Building 6</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Building 7</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Appendix A: Emissions Calculations

Dust Collector Air Flow Diagram for Plastic Timber Machining Process

Company Name: Poly-Wood, LLC
Address City IN Zip: 1001 W. Brooklyn Street, Syracuse, IN 46567
Operating Permit No.: F 085-41789-00132
SPR No.: 085-43740-00132
Reviewer: Aida DeGuzman

Design Center
Building 1
Saws
Incoming matl. 385.9 lbs/hr 0.19 tons/hr → 1 CNC Machine
Incoming matl. 338.9 lbs/hr 0.19 tons/hr → Dust Collector
001-2
Stack 23
5,000 CFM

Building 4
Saws
Incoming matl. 771.7 lbs/hr 0.39 tons/hr → 2 CNC Machines
Incoming matl. 767.8 lbs/hr 0.39 tons/hr → Dust Collector
001-5
Stack 96
10,000 CFM

Building 5A
Saws
Incoming matl. 8874.4 lbs/hr 4.44 tons/hr → 23 CNC Machines
Incoming matl. 8829.7 lbs/hr 4.41 tons/hr → Dust Collector
001-6
Stack 107
58,000 CFM

Building 5B
Saws
Incoming matl. 2315.1 lbs/hr 1.16 tons/hr → 6 CNC Machines
Incoming matl. 2303.4 lbs/hr 1.15 tons/hr → Dust Collector
001-4
Stack 72
35,000 CFM

Building 6
Saws
Incoming matl. 3858.5 lbs/hr 1.93 tons/hr → 10 CNC Machines
Incoming matl. 3838.8 lbs/hr 1.92 tons/hr → Dust Collector
006-1
Stack 69
30,000 CFM

* → Denotes material flow through process
** → Denotes air flow through stack
Appendix A: Emissions Calculations
Extruders 1-18
Building 1 - Plastic Extrusion

Company Name: Poly-Wood, LLC
Address City IN Zip: 1001 W. Brooklyn Street, Syracuse, IN 46567
Operating Permit No.: F 085-41789-00132
SPR No.: 085-43740-00132
Reviewer: Aida DeGuzman

<table>
<thead>
<tr>
<th>Process</th>
<th>Total Maximum Capacity (lb/hr)</th>
<th>Maximum Capacity (tons per hr)</th>
<th>PM/PM10/PM2.5 Emission Factor (lb/ton)</th>
<th>PM/PM10/PM2.5 Potential to Emit (tons per year)</th>
<th>VOC Emission Factor (lb/ton)</th>
<th>VOC/HAP - Hexane Potential to Emit (tons per year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plastic Extrusion (18 units)</td>
<td>9000</td>
<td>4.50</td>
<td>0.0958</td>
<td>1.89</td>
<td>0.0706</td>
<td>1.39</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Process</th>
<th>Usage Rate (lb/hr)</th>
<th>Emission Factor</th>
<th>Potential to Emit</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>NOx (%)</td>
<td>CO (%)</td>
<td>NOx (tons/yr)</td>
</tr>
<tr>
<td>Blowing Agent</td>
<td>66</td>
<td>0</td>
<td>0.13</td>
</tr>
</tbody>
</table>

Methodology
Plastic Extrusion emission factors based on "Plastic Production and Products Manufacturing", Michigan DEQ
Plastic Extrusion Potential to Emit (tons/yr) = Maximum Capacity (tons/hr) * EF (lb/ton) * conversion (8760 hr/yr) * conversion (ton/2000 lb)
Blowing Agent Potential to Emit (tons/yr) = Usage Rate (lb/hr) * EF (%) * conversion (8760 hr/yr) * conversion (ton/2000 lb)
the emission factor was corrected from 0.0985 to 0.0958
Appendix A: Emissions Calculations

Potential to Emit

Aluminum Frame Sanding

Company Name: Poly-Wood, LLC
Address City IN Zip: 1001 W. Brooklyn Street, Syracuse, IN 46567
Operating Permit No.: F 085-41789-00132
SPR No.: 085-43740-00132
Reviewer: Aida DeGuzman

Note: The only process in the aluminum frame construction operation that emits air pollutants is the sanding operation.

<table>
<thead>
<tr>
<th>Emissions Unit</th>
<th>Dust Collected (lb/hr)</th>
<th>Particle sizing catch wt. (%)</th>
<th>Uncontrolled PM (tons/yr)</th>
<th>PM10 (tons/yr)</th>
<th>PM2.5 (tons/yr)</th>
<th>Control Efficiency wt. (%)</th>
<th>Particle sizing emissions PM (tons/yr)</th>
<th>PM10 (tons/yr)</th>
<th>PM2.5 (tons/yr)</th>
<th>Controlled PTE at designed Control Efficiency of 99% (tons/yr)</th>
<th>Limited Potential to Emit at 50% Control Efficiency (tons/yr)</th>
<th>Emission Limits FESOP and 326 IAC 2-2 (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sanding Operation</td>
<td>43.2</td>
<td>52.9% 29.5%</td>
<td>191.11</td>
<td>101.10</td>
<td>56.38</td>
<td>99%</td>
<td>32.1% 14.3%</td>
<td>1.91</td>
<td>0.6</td>
<td>0.3</td>
<td>95.55</td>
<td>30.67</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>21.82</td>
<td>7.00</td>
<td>3.12</td>
</tr>
</tbody>
</table>

**Methodology**

Uncontrolled (tons/yr) = amount collected + amount emitted =

Uncontrolled (tons/yr) = Dust Collected (lb/hr) * (1 - Control Efficiency %) + Dust Collected (lb/hr) * conversion (8760 hrs/yr) * conversion (ton/2000lbs)

Controlled (tons/year) = Uncontrolled (tons/yr) * (1 - Control Efficiency %)

Limited (ton/year) = 1.5 lbs/hour * conversion (8760hour/yr) * conversion (ton/2000lbs)

**Note:**

Particle sizing factors are located in AP-42, Appendix B.1, page B.1-48, Woodworking waste collection operations: belt sander hood exhauste to cyclone = Particle sizing of cyclone weight % = 52.9% is PM10 and 29.5% is PM2.5. Controlled wt % after cyclone and fabric filter is 32.1% PM10 and 14.3% PM2.5. As a worst case, PM, PM10, and PM2.5 emissions are based on the calculated amount collected plus the calculated amount emitted.
## Appendix A: Emissions Calculations
### Potential to Emit
#### Powder Coating Operations

**Company Name:** Poly-Wood, LLC  
**Address City IN Zip:** 1001 W. Brooklyn Street, Syracuse, IN 46567  
**Operating Permit No.:** F 085-41789-00132  
**SPR No.:** 085-43740-00132  
**Reviewer:** Aida DeGuzman

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Usage (lb/hr)</th>
<th>Transfer Efficiency (%)</th>
<th>Uncontrolled PM10/PM2.5 (tons/yr)</th>
<th>Design Control Efficiency (%)</th>
<th>Particle sizing Wt. %</th>
<th>Controlled PTE at designed control efficiency of 99% (tons/yr)</th>
<th>Limited Potential to Emit at 50% Control Efficiency (tons/yr)</th>
<th>Emission Limits FESOP and 326 IAC 6-2 (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Powder Coating</td>
<td>36</td>
<td>50%</td>
<td>78.84</td>
<td>99%</td>
<td></td>
<td>0.79</td>
<td>0.43</td>
<td>0.31</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.18 lb/hr PM</td>
<td>0.31</td>
<td>0.31</td>
</tr>
</tbody>
</table>

At 99% design control efficiency, it meets the limit of 0.28 lb/hr under 326 IAC 6-3-2

**Methodology**
- Uncontrolled (tons/yr) = Usage (lb/hr) * (1 - Transfer Eff. (%)) * conversion (8760 hrs/yr) * conversion (ton/2000lbs)
- PM Controlled (ton/yr) = Uncontrolled (tons/year) * (1 - Control Eff. (%))
- PM10/PM2.5 Controlled (ton/yr) = PM Controlled (ton/yr) * Particle size (%)
- Limited (ton/year) = limit (lbs/hour) * conversion (8760hour/yr) * conversion (ton/2000lbs)

PM Powder-coat  
43740 Calcs.xlsx
Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: Poly-Wood, LLC
Address City IN Zip: 1001 W. Brooklyn Street, Syracuse, IN 46567
Operating Permit No.: F 085-41789-00132
SPR No.: 085-43740-00132
Reviewer: Aida DeGuzman

<table>
<thead>
<tr>
<th>PROCESS</th>
<th>Number of Stations</th>
<th>Max. electrode consumption per station (lbs/hr)</th>
<th>EMISSION FACTORS* (lb pollutant/lb electrode)</th>
<th>EMISSIONS (lbs/hr)</th>
<th>HAPS (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>WELDING</td>
<td></td>
<td></td>
<td>PM/PM10/PM2.5/Mn</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Metal Inert Gas (MIG)(carbon steel)</td>
<td>1</td>
<td>0.13</td>
<td>0.0055/0.0055/0.0055</td>
<td>0.001/0.001/0.001</td>
<td></td>
</tr>
<tr>
<td>Metal Inert Gas (MIG)(Aluminum)</td>
<td>9</td>
<td>0.25</td>
<td>0.075/0.0005/0.0005</td>
<td>0.169/0.001/0.001</td>
<td></td>
</tr>
<tr>
<td>Tungsten Inert Gas (TIG)(Aluminum)</td>
<td>8</td>
<td>0.41</td>
<td>0.075/0.0005/0.0005</td>
<td>0.248/0.002/0.002</td>
<td></td>
</tr>
</tbody>
</table>

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

**Methodology:**
*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

Potential Emissions lbs/hr = 0.42 lb/hr + 0.00 lb/hr + 0.00 lb/hr
Potential Emissions lbs/day = 10.01 lb/hr x 24 hrs/day = 0.08 tons/year + 0.00 tons/year + 0.00 tons/year
Potential Emissions tons/year = 1.83 tons/year + 0.02 tons/year + 0.02 tons/year

Welding
43740 Calcs.xlsx
Appendix A: Emission Calculations
Reciprocating Internal Combustion Engines - Natural Gas
4-Stroke Lean-Burn (4SLB) Engines (46 kW)

Company Name: Poly-Wood, LLC
Address City IN Zip: 1001 W. Brooklyn Street, Syracuse, IN 46567
Operating Permit No.: F 085-41789-00132
SPR No.: 085-43740-00132
Reviewer: Aida DeGuzman

Maximum Heat Input Capacity (MMBtu/hr) 0.16
Maximum Hours Operated per Year (hr/yr) 500
Potential Fuel Usage (MMBtu/yr) 78.55
High Heat Value (MMBtu/MMscf) 1020
Potential Fuel Usage (MMcf/yr) 0.08

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor (lb/MMBtu)</th>
<th>Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>7.71E-05</td>
<td>0.000</td>
</tr>
<tr>
<td>PM10*</td>
<td>9.99E-03</td>
<td>0.000</td>
</tr>
<tr>
<td>PM2.5*</td>
<td>9.99E-03</td>
<td>0.000</td>
</tr>
<tr>
<td>SO2</td>
<td>5.88E-04</td>
<td>0.000</td>
</tr>
<tr>
<td>NOx</td>
<td>4.08E+00</td>
<td>0.16</td>
</tr>
<tr>
<td>VOC</td>
<td>1.18E-01</td>
<td>0.000</td>
</tr>
<tr>
<td>CO</td>
<td>3.17E-01</td>
<td>0.000</td>
</tr>
</tbody>
</table>

*PM emission factor is for filterable PM-10. PM10 emission factor is filterable PM10 + condensable PM.
PM2.5 emission factor is filterable PM2.5 + condensable PM.

Hazardous Air Pollutants (HAPs)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor (lb/MMBtu)</th>
<th>Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acetaldehyde</td>
<td>8.36E-03</td>
<td>0.000</td>
</tr>
<tr>
<td>Acrolein</td>
<td>5.14E-03</td>
<td>0.000</td>
</tr>
<tr>
<td>Benzene</td>
<td>4.40E-04</td>
<td>0.000</td>
</tr>
<tr>
<td>Biphenyl</td>
<td>2.12E-04</td>
<td>0.000</td>
</tr>
<tr>
<td>1,3-Butadiene</td>
<td>2.67E-04</td>
<td>0.000</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>5.28E-02</td>
<td>0.002</td>
</tr>
<tr>
<td>Methanol</td>
<td>2.50E-03</td>
<td>0.000</td>
</tr>
<tr>
<td>Hexane</td>
<td>1.10E-03</td>
<td>0.000</td>
</tr>
<tr>
<td>Toluene</td>
<td>4.08E-04</td>
<td>0.000</td>
</tr>
<tr>
<td>2,2,4-Trimethylpentane</td>
<td>2.50E-04</td>
<td>0.000</td>
</tr>
<tr>
<td>Xylene</td>
<td>1.84E-04</td>
<td>0.000</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>0.003</strong></td>
</tr>
</tbody>
</table>

HAP pollutants consist of the eleven highest HAPs included in AP-42 Table 3.2-2.

Methodology
Emission Factors are from AP-42 (Supplement F, July 2000), Table 3.2-2
Potential Fuel Usage (MMBtu/yr) = [Maximum Heat Input Capacity (MMBtu/hr)] * [Maximum Hours Operating per Year (hr/yr)]
Potential Emissions (tons/yr) = [Potential Fuel Usage (MMBtu/yr)] * [Emission Factor (lb/MMBtu)] / [2000 lb/ton]

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
SO2 = Sulfur Dioxide
NOx = Nitrous Oxides
VOC = Volatile Organic Compounds
CO = Carbon Monoxide

2019 EmGen 46 KW
43740 Calcs.xlsx
### Appendix A: Emission Calculations

**Reciprocating Internal Combustion Engines - Natural Gas**  
4-Stroke Lean-Burn (4SLB) Engines

**Company Name:** Poly-Wood, LLC  
**Address City IN Zip:** 1001 W. Brooklyn Street, Syracuse, IN 46567  
**Operating Permit No.:** F 085-41789-00132  
**SPR No.:** 085-43740-00132  
**Reviewer:** Aida DeGuzman

| Maximum Heat Input Capacity (MMBtu/hr) | 0.49 | 192 HP |
| Maximum Hours Operated per Year (hr/yr) | 500 |
| Potential Fuel Usage (MMBtu/yr) | 244.4831 |
| High Heat Value (MMBtu/MMscf) | 1020 |
| Potential Fuel Usage (MMcf/yr) | 0.24 |

#### Criteria Pollutants

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor (lb/MMBtu)</th>
<th>Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>7.71E-05</td>
<td>0.00001</td>
</tr>
<tr>
<td>PM10*</td>
<td>9.99E-03</td>
<td>0.00122</td>
</tr>
<tr>
<td>PM2.5*</td>
<td>9.99E-03</td>
<td>0.00122</td>
</tr>
<tr>
<td>SO2</td>
<td>5.88E-04</td>
<td>0.00007</td>
</tr>
<tr>
<td>NOx</td>
<td>4.08E+00</td>
<td>0.50</td>
</tr>
<tr>
<td>VOC</td>
<td>1.18E-01</td>
<td>0.01</td>
</tr>
<tr>
<td>CO</td>
<td>3.17E-01</td>
<td>0.04</td>
</tr>
</tbody>
</table>

*PM emission factor is for filterable PM-10. PM10 emission factor is filterable PM10 + condensable PM. PM2.5 emission factor is filterable PM2.5 + condensable PM.

#### Hazardous Air Pollutants (HAPs)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor (lb/MMBtu)</th>
<th>Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acetaldehyde</td>
<td>8.36E-03</td>
<td>0.001</td>
</tr>
<tr>
<td>Acrolein</td>
<td>5.14E-03</td>
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<td>Benzene</td>
<td>4.40E-04</td>
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<td>Biphenyl</td>
<td>2.12E-04</td>
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<tr>
<td>1,3-Butadiene</td>
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<tr>
<td>Formaldehyde</td>
<td>5.28E-02</td>
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<td>Methanol</td>
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<td>Hexane</td>
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<td>Toluene</td>
<td>4.08E-04</td>
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<td>2,2,4-Trimethylpentane</td>
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<tr>
<td>Xylene</td>
<td>1.84E-04</td>
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</table>

Total 0.01

HAP pollutants consist of the eleven highest HAPs included in AP-42 Table 3.2-2.

#### Methodology

Emission Factors are from AP-42 (Supplement F, July 2000), Table 3.2-2

Potential Fuel Usage (MMBtu/yr) = [Maximum Heat Input Capacity (MMBtu/hr)] * [Maximum Hours Operating per Year (hr/yr)]

Potential Emissions (tons/yr) = [Potential Fuel Usage (MMBtu/yr)] * [Emission Factor (lb/MMBtu)] / [2000 lb/ton]

#### Abbreviations

PM = Particulate Matter  
NOx = Nitrous Oxides  
PM10 = Particulate Matter (<10 um)  
VOC = Volatile Organic Compounds  
SO2 = Sulfur Dioxide  
CO = Carbon Monoxide
## Appendix A: Emissions Calculations

### Plastic Extrusion LAB

**Company Name:** Poly-Wood, LLC  
**Address:** 1001 W. Brooklyn Street, Syracuse, IN 46567  
**Operating Permit No.:** F 085-41789-00132  
**SPR No.:** 085-43740-00132  
**Reviewer:** Aida DeGuzman

<table>
<thead>
<tr>
<th>Process</th>
<th>Maximum Capacity (lb/hr)</th>
<th>Maximum Capacity (tons/hr)</th>
<th>PM/PM10/PM2.5 Emission Factor (lb/ton)</th>
<th>PM/PM10/PM2.5 Potential to Emit (tons per year)</th>
<th>VOC Emission Factor (lb/ton)</th>
<th>VOC/HAP - Hexane Potential to Emit (tons per year)</th>
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<tbody>
<tr>
<td>Extrusion LAB</td>
<td>50</td>
<td>0.03</td>
<td>0.0958</td>
<td>0.01</td>
<td>0.0706</td>
<td>0.01</td>
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### Usage Rate

<table>
<thead>
<tr>
<th>Process</th>
<th>Usage Rate (lb/hr)</th>
<th>Emission Factor</th>
<th>Potential to Emit</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>NOx (%)</td>
<td>CO (%)</td>
</tr>
<tr>
<td>Blowing Agent</td>
<td>0.476</td>
<td>0</td>
<td>0.13</td>
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</table>

### Methodology

Plastic Extrusion emission factors based on "Plastic Production and Products Manufacturing", Michigan DEQ

Plastic Extrusion Potential to Emit (tons/yr) = Maximum Capacity (tons/hr) * EF (lb/ton) * conversion (8760 hr/yr) * conversion (ton/2000 lb)

Blowing Agent Potential to Emit (tons/yr) = Usage Rate (lb/hr) * EF (%) * conversion (8760 hr/yr) * conversion (ton/2000 lb)

The emission factor was corrected from 0.0985 to 0.0958.
## Tool and Die Washer

**Company Name:** Poly-Wood, LLC  
**Address City IN Zip:** 1001 W. Brooklyn Street, Syracuse, IN 46567  
**Operating Permit No.:** F 085-41789-00132  
**SPR No.:** 085-43740-00132  
**Reviewer:** Aida DeGuzman

### Process

<table>
<thead>
<tr>
<th>Process</th>
<th>Maximum Capacity (lb/hr)</th>
<th>Maximum Capacity (tons per hr)</th>
<th>***VOC Emission Factor (lb/ton)</th>
<th>VOC/HAP - Hexane Potential to Emit (tons per year)</th>
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<tbody>
<tr>
<td><em>Cleaning Tools with HDPE</em></td>
<td>130</td>
<td>0.07</td>
<td>0.0706</td>
<td>0.02</td>
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<tr>
<td><strong>Blowing Agent</strong></td>
<td>1.2376</td>
<td>0.13</td>
<td>0.01</td>
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</table>

### Methodology

**Fluidized Washer** uses Aluminum Oxide Sand. There are no emissions from the Aluminum Oxide Sand, but emissions from the cleaning of the HDPE plastic that is on the tool before placed into the washer.

**The HDPE tool would also include the blowing agent. The blowing agent is part of the HDPE product.**

***Plastic Extrusion emission factors based on "Plastic Production and Products Manufacturing", Michigan DEQ

Cleaning of HDPE from Tool and Die Potential to Emit (tons/yr) = Maximum Capacity (tons/hr) * EF (lb/ton) * conversion (8760 hr/yr) * conversion (ton/2000 lb)

Cleaning of HDPE also includes the Blowing Agent Potential to Emit (tons/yr) = Usage Rate (lb/hr) * EF (%) * conversion (8760 hr/yr) * conversion (ton/2000 lb)
### Emissions Calculations

#### 326 IAC 6-3-2 Limits

**Company Name:** Poly-Wood, LLC  
**Address City IN Zip:** 1001 W. Brooklyn Street, Syracuse, IN 46567  
**Operating Permit No.:** F 085-41789-00132  
**SPR No.:** 085-43740-00132  
**Reviewer:** Aida DeGuzman

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Process Weight Rate (lbs/hr)</th>
<th>Process Weight Rate (tons/hr)</th>
<th>Emissions Uncontrolled (lb/hr)</th>
<th>326 IAC 6-3-2 Limit (lb/hr)</th>
<th>326 IAC 6-3-2 Limit (tons/hr)</th>
<th>Emissions Controlled (lb/hr)</th>
<th>DC ID</th>
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<tr>
<td>Plastic Extrusion, 1-18 (Building 1)</td>
<td>9,900</td>
<td>4.50</td>
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<td>Plastic Extrusion, 19-58 (Building 7)</td>
<td>20,000</td>
<td>10.00</td>
<td>0.06</td>
<td>N</td>
<td>NA</td>
<td>NA</td>
<td>007-01</td>
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</table>

#### Emissions Calculations

1. The Process Weight Rate is determined by the max rate through each CNC machine: 384 lbs/hr

2. The 326 IAC 6-3-2 pounds per hour particulate emission limitation was calculated with the following equation:
   \[ E = 4.10 \times P^{0.67} \]
   
3. These emission units dust collectors are designed at 96% control efficiency. Based on this efficiency, these units can comply with 326 IAC 6-3-2.
May 4, 2021

Jeremy Dreier  
Poly-Wood LLC  
1001 W Brooklyn St  
Syracuse IN 46567

Re: Public Notice  
Poly-Wood, LLC  
Permit Level: FESOP Significant Permit Rev  
(Minor PSD/EO) (120)  
Permit Number: 085-43740-00132

Dear Jeremy Dreier:

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 43740 and

IDEM’s Virtual File Cabinet (VFC): https://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/public-notices/

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 Syracuse-Turkey Creek Township Public Library, 115 E Main St, Syracuse IN 46567. 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 Aida DeGuzman, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-4972 or dial (317) 233-4972.

Sincerely,

L. Pogost

L. Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter access via website 8/10/2020
May 4, 2021

To: Syracuse-Turkey Creek Township Public Library 115 E Main St Syracuse IN 46567

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: Poly-Wood, LLC
Permit Number: 085-43740-00132

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

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

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

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

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

Enclosures
PN Library updated 4/2019
Notice of Public Comment

May 4, 2021
Poly-Wood, LLC
085-43740-00132

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/public-notices/.

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.
Mail Code 61-53

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<td>Vance Lopp 6668 E Waco Drive Syracuse IN 46564 (Affected Party)</td>
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<td>Polly Mishler D &amp; B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)</td>
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**Type of Mail**: CERTIFICATE OF MAILING ONLY

**Remarks**:
The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mail merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See *Domestic Mail Manual R900, S913, and S921* for limitations of coverage on insured and COD mail. See *International Mail Manual* for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.

**Mail Code 61-53**

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