



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

April 24, 2024

To: Osgood Public Library

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

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

Applicant Name: Case Makes
Permit Number: 137-47390-00022

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

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

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

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

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

Enclosures
PN Library updated 4/2019



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April 24, 2024

Jonathan Hummer
Case Makes
604 Railroad Ave
Osgood, IN 47307

Re: Public Notice
Case Makes
Permit Level: FESOP Renewal/Significant New
Source Review
Permit Number: 137-47390-00022

Dear Jonathan Hummer:

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 47390

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 Osgood Public Library, 136 W. Ripley St. in Osgood, IN 47037. 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 Taylor Wade, 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 0868 or dial (317) 233-0868.

Sincerely,

Jennifer Scott

Jennifer Scott
Permits Branch
Office of Air Quality

Enclosures

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



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NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal and New Source Review of a
Federally Enforceable State Operating Permit (FESOP)

for Case Makes in Ripley County

FESOP Renewal No.: F137-47390-00022

The Indiana Department of Environmental Management (IDEM) has received an application from Case Makes, located at 604 Railroad Ave, Osgood, IN 47037, for a new source review and renewal of its FESOP issued on May 30, 2019. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Case Makes to make certain changes at its existing source. Case Makes has applied to construct three (3) laminators, one (1) natural gas fired boiler and modifying an existing laminator.

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:

Osgood Public Library
136 W. Ripley St.
Osgood, IN 47037

and

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

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

A copy of the application and preliminary findings is also available via IDEM's Virtual File Cabinet (VFC). To access VFC, please go to: <https://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?

This notice is posted on IDEM's website (<https://www.in.gov/idem/public-notices/>). The date that this notice is posted on IDEM's website 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 IDEM decides to conduct a public hearing and/or public meeting, IDEM will post a separate announcement of the date, time, and location of that public hearing and/or public meeting on IDEM's website (<https://www.in.gov/idem/public-notices/>). 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 F137-47390-00022 in all correspondence.

Comments should be sent to:

Taylor Wade
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Taylor Wade or (317) 233-0868
Or dial directly: (317) 233-0868
Fax: (317) 232-6749 attn: Taylor Wade
E-mail: twade@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/public-participation/>; and the Citizens' Guide to IDEM on the Internet at: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>.

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 Taylor Wade or my staff at the above address.



Ghassan Shalabi, Section Chief
Permits Branch
Office of Air Quality



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Eric J. Holcomb
Governor

DRAFT

Brian C. Rockensuess
Commissioner

New Source Review and Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Case Makes
604 Railroad Avenue
Osgood, Indiana 47037**

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

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

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

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

| | |
|---|------------------|
| Operation Permit No.: F137-47390-00022 | |
| Master Agency Interest ID: 100039 | |
| Issued by: | Issuance Date: |
| Ghassan Shalabi, Section Chief Permits Branch Office of Air Quality | Expiration Date: |

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 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 specialty paper manufacturing operation.

| | |
|------------------------------|--|
| Source Address: | 604 Railroad Avenue, Osgood, Indiana 47037 |
| General Source Phone Number: | (812) 747-9101 |
| SIC Code: | 2672 (Coated and Laminated Paper, NEC) |
| County Location: | Ripley |
| 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) laminator, identified as L1, constructed in 2006, approved for modification in 2024, with a maximum capacity of 750 feet per minute, using no control, and exhausting to one (1) ozone and one (1) steam stack.
- (b) One (1) laminator, identified as L2, approved for construction in 2024, with a maximum capacity of 750 feet per minute, using no control, and exhausting to one (1) ozone and one (1) steam stack.
- (c) One (1) maintenance grinding operation, constructed in 2006, using a baghouse, identified as DC1, for particulate control, and exhausting to stack SDC-1.

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, as defined in 326 IAC 2-7-1(21):

- (a) One (1) laminator, identified as Mini Laminator, approved in 2024 for construction, with a maximum capacity of 50 ft/min, using no control, and exhausting indoors.
- (b) One (1) laminator, identified as L3, approved in 2024 for construction, used to apply an adhesive film at a maximum capacity of 400 ft/min, using no coating, using no control, and exhausting indoors.
- (c) Two (2) natural gas-fired dryers, associated with Laminator L1, identified as L1D1 and L1D2, constructed in 2006, each with a maximum heat input capacity of 3.45 MMBtu/hr, using no control, and exhausting to stacks SL1-D1 and SL1-D2 respectively.
- (d) Two (2) natural gas-fired dryers, associated with Laminator L2, identified as L2D1 and L2D2, approved for construction in 2024, each with a maximum heat input capacity of 3.45 MMBtu/hr, using no control, and exhausting to stacks SL1-D1 and SL1-D2

respectively.

- (e) Four (4) natural gas-fired space heaters, identified as R1 through R4, constructed in 2001, with a maximum heat input capacity of 0.2 MMBtu/hr each, exhausting to stacks SR-1 through SR-4 respectively.
- (f) One (1) natural gas-fired space heaters, identified R6, constructed in 2023, with a total maximum heat input capacity of 0.05 MMBtu/hr, exhausting outdoors.
- (g) Three (3) natural gas-fired space heaters, identified as C1 through C3, constructed in 2006, with a total maximum heat input capacity of 3.5 MMBtu, exhausting outdoors.
- (h) Three (3) natural gas-fired Makeup Air units, identified as AA1 through AA3, constructed in 2021, with a maximum heat input capacity of 0.583 MMBtu/hr each, exhausting outdoors.
- (i) One (1) natural gas-fired boiler, identified as H2, approved in 2024 for construction, with a maximum heat input capacity of 0.65 MMBtu/hr, exhausting to stack SH-2.
- (j) Paved roads.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F137-47390-00022, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

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

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

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

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

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

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

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

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

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
- (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The

PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Southeast Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

- (a) All terms and conditions of permits established prior to F137-47390-00022 and issued pursuant to permitting programs approved into the state implementation plan have been either:

- (1) incorporated as originally stated,
- (2) revised, or
- (3) deleted.

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

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

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

- (b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), 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(a)(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 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.14 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.15 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.16 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.17 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.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) laminator, identified as L1, constructed in 2006, approved for modification in 2024, with a maximum capacity of 750 feet per minute, using no control, and exhausting to one (1) ozone and one (1) steam stack.
- (b) One (1) laminator, identified as L2, approved for construction in 2024, with a maximum capacity of 750 feet per minute, using no control, and exhausting to one (1) ozone and one (1) steam stack.

Insignificant Activities:

- (a) One (1) laminator, identified as Mini Laminator, approved in 2024 for construction, with a maximum capacity of 50 ft/min, using no control, and exhausting indoors.

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

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

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

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

- (a) Total input of VOC from the three (3) laminators (L1, L2 and Mini Laminator) shall not exceed 90.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

D.1.2 FESOP, HAP Minor Limits [326 IAC 2-8-4] [326 IAC 2-4.1]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable, the Permittee shall comply with the following:

Total input of any single HAP from the three (3) laminators (L1, L2 and Mini Laminator) shall be less than 9.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable, and this source is an area source of HAP emissions under Section 112 of the Clean Air Act (CAA).

D.1.3 Volatile Organic Compounds (VOC) Limitations (Paper Coating Operations) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (b), the Permittee shall not allow or permit the discharge into the atmosphere of any VOC in excess of thirty-five hundredths (0.35) kilogram per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, delivered to the coating applicator from a paper coating line.

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

A Preventive Maintenance Plan is required for these facilities and any 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 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IACC 8-1-4]

- (a) Compliance with the VOC and HAP input limitations contained in Conditions D.1.1 and D.1.2, shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Compliance with the VOC content limits contained in Condition D.1.3, shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulations data supplied by the coating manufacture. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.6 Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.1, D.1.2, and D.1.3 the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP input limits established in Conditions D.1.1, D.1.2 and VOC content limits established in Condition D.1.3. Records necessary to demonstrate compliance shall be available no later than 30 days of the end of each compliance period.
 - (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
 - (3) The total VOC and HAP input for each month; and
 - (4) The total VOC and HAP input for each compliance period.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations 1 with regard to the record keeping required by the condition.

D.1.7 Reporting Requirements

A quarterly report of VOC input from three (3) laminators (L1, L2, Mini Laminator) and a quarterly summary of the information to document the compliance status with D.1.1 and D.1.2 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.

The report 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).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) natural gas-fired dryers, associated with Laminator L1, identified as L1D1 and L1D2, constructed in 2006, each with a maximum heat input capacity of 3.45 MMBtu/hr, using no control, and exhausting to stacks SL1-D1 and SL1-D2 respectively.
- (b) Two (2) natural gas-fired dryers, associated with Laminator L2, identified as L2D1 and L2D2, approved for construction in 2024, each with a maximum heat input capacity of 3.45 MMBtu/hr, using no control, and exhausting to stacks SL1-D1 and SL1-D2
- (g) One (1) natural gas-fired boiler, identified as H2, approved in 2024 for construction, with a maximum heat input capacity of 0.65 MMBtu/hr, exhausting to stack SH-2.

(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 Emissions [326 IAC 6-2-4]

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

| Emission Unit | Pt (lb/MMBtu) |
|---------------|---------------|
| L1D1 Dryer | 0.51 (each) |
| L1D2 Dryer | |
| L2D1 Dryer | 0.54 (each) |
| L2D2 Dryer | |
| Boiler H2 | |

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Case Makes
Source Address: 604 Railroad Avenue, Osgood, Indiana 47037
FESOP Permit No.: F137-47390-00022

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:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Case Makes
Source Address: 604 Railroad Avenue, Osgood, Indiana 47037
FESOP Permit No.: F137-47390-00022

This form consists of 2 pages

Page 1 of 2

| |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• 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

Page 2 of 2

| |
|---|
| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? Y N |
| Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

FESOP Usage Report

(Submit Report Quarterly)

Source Name: Case Makes
Source Address: 604 Railroad Avenue, Osgood, Indiana 47037
FESOP Permit No.: F137-47390-00022
Facility: Laminators L1, L2 and Mini Laminator
Parameter: VOC input (total)
Limit: Total input of VOC from the three (3) laminators (L1, L2 and Mini Laminator) shall not exceed 90.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|-------|-----------------------|-----------------------|-----------------------|
| | VOC (tons) | VOC (tons) | VOC (tons) |
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Case Makes
Source Address: 604 Railroad Avenue, Osgood, Indiana 47037
FESOP Permit No.: F137-47390-00022
Facility: Laminators L1, L2 and Mini Laminator
Parameter: Single HAP Input
Limit: Total input of Single HAP from the three (3) laminators (L1, L2 and Mini Laminator) shall be less than 9.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|-------|--------------------------|--------------------------|--------------------------|
| | Any Single HAP (Tons) | Any Single HAP (Tons) | Any Single HAP (Tons) |
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**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: Case Makes
Source Address: 604 Railroad Avenue, Osgood, Indiana 47037
FESOP Permit No.: F137-47390-00022

Months: _____ to _____ Year: _____

| | |
|--|-------------------------------|
| <p>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".</p> | |
| <input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. | |
| <input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP) Renewal with New
Source Review (NSR)

Source Description and Location

| | |
|----------------------------|---|
| Source Name: | Case Makes |
| Source Location: | 604 Railroad Ave, Osgood, IN 47037 |
| County: | Ripley |
| SIC Code: | 2672 (Coated and Laminated Paper, NEC) |
| Permit Renewal No.: | F 137-47390-00022 |
| Permit Reviewer: | Taylor Wade |

On January 4, 2024, Case Makes submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from Case Makes relating to the operation of a specialty paper manufacturing operation. Case Makes was issued its FESOP (F137-41158-00022) on May 30, 2019.

Existing Approvals

The source was issued FESOP No. F137-41158-00022 on May 30, 2019. The source has since received the following approval:

FESOP Administrative Amendment No. 137-43485-00022 on December 3, 2020.

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

Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) laminator, identified as L1, constructed in 2006, with a maximum capacity of 600 feet per minute, using no control, and exhausting to one (1) ozone and one (1) steam stack.
- (b) One (1) maintenance grinding operation, constructed in 2006, using a baghouse, identified as DC1, for particulate control, and exhausting to stack SDC-1.

Emission Units and Pollution Control Equipment Removed From the Source

The source has removed the following emission units:

- (a) One (1) laminator, identified as FEEC Laminator, approved in 2019 for construction, with a maximum capacity of 450 feet per minute, using no control, and exhausting to one (1) ozone and one (1) steam stack.
- (b) Two (2) natural gas-fired dryers, associated with FEEC Laminator, identified as FEEC-D1 and FEEC-D2, constructed in 2019, each with a maximum heat input capacity of 3.45 MMBtu/hr, using no control, and exhausting to stacks S-FEEC-D1 and S-FEEC-D2 respectively.

- (c) One (1) Cleaver Brooks natural gas-fired boiler, identified as CB-1, constructed in 1961, with a maximum heat input of 6.28 MMBtu/hr, exhausting to stack SCB-1.
- (d) One (1) Cleaver Brooks natural gas-fired boiler, identified as CB-2, constructed in 1967, with a maximum heat input of 4.19 MMBtu/hr, exhausting to stack SCB-2.
- (e) One (1) natural gas-fired space heater, identified as R5, constructed in 2001, with a maximum heat input capacity of 0.2 MMBtu/hr, exhausting to stack SR-5.
- (f) One (1) Hurst natural gas-fired boiler, identified as H1, constructed in 2006, with a maximum heat input capacity of 1.25 MMBtu/hr, exhausting to stack SH-1.

Insignificant Activities

The source also consists of the following insignificant activities:

- (a) Two (2) natural gas-fired dryers, associated with Laminator L1, identified as L1D1 and L1D2, constructed in 2006, each with a maximum heat input capacity of 3.45 MMBtu/hr, using no control, and exhausting to stacks SL1-D1 and SL1-D2 respectively.
- (b) Five (5) natural gas-fired space heaters, identified as R1 through R4, constructed in 2001, with a maximum heat input capacity of 0.2 MMBtu/hr each, exhausting to stacks SR-1 through SR-4 respectively.
- (c) Three (3) natural gas-fired space heaters, identified as C1 through C3, constructed in 2006, with a total maximum heat input capacity of 3.5 MMBtu, exhausting outdoors.
- (d) Paved roads.

Emission Units and Pollution Control Equipment Constructed Under the Provisions of 326 IAC 2-1.1-3 (Exemptions)

The following existing emissions unit(s), constructed under the provisions of 326 IAC 2-1.1-3 (Exemptions), are being incorporated in the permit as part of this permitting action:

Project #1 (2021)

- (a) Three (3) natural gas-fired Makeup Air units, identified as AA1 through AA3, constructed in 2021, with a maximum heat input capacity of 0.583 MMBtu/hr each, exhausting outdoors.

Project #2 (2023)

- (a) One (1) natural gas-fired space heaters, identified R6, constructed in 2023, with a maximum heat input capacity of 0.05 MMBtu/hr, exhausting outdoors.

The total potential to emit of each project is less than levels specified at 326 IAC 2-1.1-3(e)(1)(A) through (G) and the addition of the emission units did not require the source to transition to a higher operation permit level. Therefore, pursuant to 326 IAC 2-1.1-3(e), the permit revision requirements under 326 IAC 2-8-11.1, including the requirement to submit an application, do not apply to these emission units. See Appendix A of this Technical Support Document for detailed emission calculations.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

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

County Attainment Status

The source is located in Ripley County.

Pursuant to amendments to Indiana Code IC 13-17-3-14, effective July 1, 2023, a federal regulation that classifies or amends a designation of attainment, nonattainment, or unclassifiable for any area in Indiana under the federal Clean Air Act is effective and enforceable in Indiana on the effective date of the federal regulation.

| Pollutant | Designation |
|-------------------|---|
| SO ₂ | Unclassifiable or attainment effective April 9, 2018, for the 2010 primary 1-hour SO ₂ standard. Better than national secondary standards effective March 3, 1978. |
| CO | Unclassifiable or attainment effective November 15, 1990. |
| O ₃ | Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard. |
| PM _{2.5} | Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM _{2.5} standard. |
| PM _{2.5} | Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM _{2.5} standard. |
| PM ₁₀ | Unclassifiable effective November 15, 1990. |
| NO ₂ | Unclassifiable or attainment effective January 29, 2012, for the 2010 NO ₂ standard. |
| Pb | Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard. |

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Ripley County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Ripley County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
Ripley County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

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

Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4q18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

| | Unrestricted Potential Emissions (ton/year) | | | | | | | | |
|---|---|-------------------------------|-----------------------------------|-----------------|-----------------|--------|------|-------------------------|------------|
| | PM ¹ | PM ₁₀ ¹ | PM _{2.5} ^{1, 2} | SO ₂ | NO _x | VOC | CO | Single HAP ³ | Total HAPs |
| Total PTE of Entire Source Excluding Fugitive Emissions* | 39.96 | 40.47 | 40.47 | 0.05 | 8.82 | 183.63 | 7.41 | 11.53 | 11.70 |
| Title V Major Source Thresholds | NA | 100 | 100 | 100 | 100 | 100 | 100 | 10 | 25 |
| PSD Major Source Thresholds | 250 | 250 | 250 | 250 | 250 | 250 | 250 | -- | -- |
| ¹ Under the Part 70 Permit program (40 CFR 70), PM ₁₀ and PM _{2.5} , not particulate matter (PM), are each considered as a "regulated air pollutant." ² PM _{2.5} listed is direct PM _{2.5} . ³ Single highest source-wide HAP (Triethylamine) *Fugitive HAP emissions are always included in the source-wide emissions. | | | | | | | | | |

Appendix A of this TSD reflects the detailed unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of VOC is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's VOC emissions to less than Title V major source thresholds. Therefore, the source will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all other regulated air pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the source will be issued FESOP Renewal because the source will limit HAP emissions to less than the Title V major source threshold levels. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) subject to the provisions of 326 IAC 2-7.

Description of Proposed Revision at an Existing Source

The Office of Air Quality (OAQ) has reviewed an application, submitted by Case Makes on January 4, 2024, relating to constructing three (3) laminators, one (1) boiler and modifying an existing laminator.

The following is a list of the new and modified emission units and pollution control device(s):

- (a) One (1) laminator, identified as L1, constructed in 2006, approved for modification in 2024, with a maximum capacity of 750 feet per minute, using no control, and exhausting to one (1) ozone and one (1) steam stack.
- (b) One (1) laminator, identified as L2, approved for construction in 2024, with a maximum capacity of 750 feet per minute, using no control, and exhausting to one (1) ozone and one (1) steam stack.
- (c) Two (2) natural gas-fired dryers associated with Laminator L2, identified as L2D1 and L2D2, approved for construction in 2024, each with a maximum heat input capacity of 3.45 MMBtu/hr, using no control, and exhausting to stacks SL2-D1 and SL2-D2 respectively.
- (d) One (1) laminator, identified as Mini Laminator, approved in 2024 for construction, with a maximum capacity of 50 ft/min, using no control, and exhausting indoors.
- (e) One (1) laminator, identified as L3, approved in 2024 for construction, used to apply an adhesive film at a maximum capacity of 400 ft/min, using no coating, using no control, and exhausting indoors.
- (f) One (1) natural gas-fired boiler, identified as H2, approved in 2024 for construction, with a maximum heat input capacity of 0.65 MMBtu/hr, exhausting to stack SH-2.

Permit Level Determination – FESOP Significant Permit Revision

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

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

| Process / Emission Unit | PTE Before Controls of the New Emission Units (ton/year) | | | | | | | |
|-------------------------|--|------------------|--------------------------------|-----------------|-----------------|-------|------|------------|
| | PM | PM ₁₀ | PM _{2.5} ¹ | SO ₂ | NO _x | VOC | CO | Total HAPs |
| Laminator #2 (L2) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 91.07 | 0.00 | 5.73 |
| Laminator #3 (L3) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Mini Laminator #1 (ML1) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 1.01 | 0.00 | 6.37E-02 |
| Natural Gas Boiler (H2) | 0.01 | 0.02 | 0.02 | 0.00 | 0.28 | 0.02 | 0.23 | 5.30E-03 |
| Laminator Dryer (L2D1) | 0.03 | 0.11 | 0.11 | 0.01 | 1.48 | 0.08 | 1.24 | 2.80E-02 |
| Laminator Dryer (L2D2) | 0.03 | 0.11 | 0.11 | 0.01 | 1.48 | 0.08 | 1.24 | 2.80E-02 |

| Process / Emission Unit | PTE Before Controls of the New Emission Units (ton/year) | | | | | | | |
|---|--|------------------|--------------------------------|-----------------|-----------------|--------------|-------------|-------------|
| | PM | PM ₁₀ | PM _{2.5} ¹ | SO ₂ | NO _x | VOC | CO | Total HAPs |
| Total PTE Before Controls of the New Emission Units: | 0.06 | 0.25 | 0.25 | 0.02 | 3.24 | 92.26 | 2.72 | 5.86 |

¹PM_{2.5} listed is direct PM_{2.5}.

| Process / Emission Unit | PTE Increase of the Modified Emission Unit(s)/Process(es) (ton/year) | | | | | | | |
|--|--|------------------|--------------------------------|-----------------|-----------------|--------------|-------------|-------------|
| | PM | PM ₁₀ | PM _{2.5} ¹ | SO ₂ | NO _x | VOC | CO | Total HAPs |
| PTE Before Modification (Laminator #1) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 72.85 | 0.00 | 4.59 |
| PTE After Modification (Laminator #1) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 91.07 | 0.00 | 5.73 |
| <i>PTE Increase (Laminator #1)</i> | <i>0.00</i> | <i>0.00</i> | <i>0.00</i> | <i>0.00</i> | <i>0.00</i> | <i>18.22</i> | <i>0.00</i> | <i>1.14</i> |
| Total PTE Increase of the Modified Emission Unit(s)/Process | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 18.22 | 0.00 | 1.14 |

¹PM_{2.5} listed is direct PM_{2.5}.

| | PTE Increases Due to the Modification (ton/year) | | | | | | | |
|---|--|------------------|--------------------------------|-----------------|-----------------|---------------|-------------|-------------|
| | PM | PM ₁₀ | PM _{2.5} ¹ | SO ₂ | NO _x | VOC | CO | Total HAPs |
| Total PTE Before Controls of the New Emission Units | 0.06 | 0.25 | 0.25 | 0.02 | 3.24 | 92.26 | 2.72 | 5.86 |
| Total PTE Increase of the Modified Emission Unit(s)/Process | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 18.22 | 0.00 | 1.14 |
| Total PTE of the Modification | 0.07 | 0.24 | 0.24 | 0.02 | 3.24 | 110.47 | 2.71 | 7.00 |

¹PM_{2.5} listed is direct PM_{2.5}.

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

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

- (i) Volatile Organic Compounds (VOC).

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 adding a new HAP minor limit.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any new control equipment is considered federally enforceable only after issuance of this FESOP renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

| | Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) | | | | | | | | |
|---|--|-------------------------------|-----------------------------------|-----------------|-----------------|-------|------|-------------------------|------------|
| | PM ¹ | PM ₁₀ ¹ | PM _{2.5} ^{1, 2} | SO ₂ | NO _x | VOC | CO | Single HAP ³ | Total HAPs |
| Total PTE of Entire Source Excluding Fugitive Emissions* | 39.96 | 40.47 | 40.47 | 0.05 | 8.82 | 90.49 | 7.41 | 9.0 | 11.53 |
| Title V Major Source Thresholds | NA | 100 | 100 | 100 | 100 | 100 | 100 | 10 | 25 |
| PSD Major Source Thresholds | 250 | 250 | 250 | 250 | 250 | 250 | 250 | NA | NA |

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM_{2.5}, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM_{2.5} listed is direct PM_{2.5}.
³Single highest source-wide HAP. (Triethylamine)
 *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 limit(s) in order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA). See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-8 (FESOP), 326 IAC 2-2 (PSD), and 326 IAC 2-3 (Emission Offset), and 326 IAC 20 (Hazardous Air Pollutants) for more information regarding the limit(s).

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability

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

New Source Performance Standards (NSPS):

- (a) The requirements of the New Source Performance Standard for Small Industrial- Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for this source, because the boiler identified as H2 has a maximum heat input less than 10 MMBtu/hr.
- (b) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for the Printing and Publishing Industry, 40 CFR 63, Subpart KK and 326 IAC 20-18 are not included in the permit for this source, since the source does not operate any publication rotogravure, product and packing rotogravure or wide-web flexographic printing presses. Additionally, this source is not a major source of HAPs.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paper and Other Web Coatings, 40 CFR 63, Subpart JJJJ and 326 IAC 20-65 are not included in the permit for this source, since this source is not a major source of HAPs.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Printing, Coating, and Dyeing of Fabrics and Other Textiles, 40 CFR 63, Subpart OOOO and 326 IAC 20-77 are not included in the permit for this source, since this source does not perform fabric and other textiles printing, coating and dyeing operations. Additionally, this source is not a major source of HAPs.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD and 326 IAC 20-95 are not included in the permit for this source, since this source is not a major source of HAPs.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ are not included in the permit for the natural gas fired boiler, identified as H2, since gas-fired boilers are specifically exempt from the requirements of this rule pursuant to 40 CFR 63.11195(e).
- (f) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

Compliance Assurance Monitoring (CAM):

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

| |
|---|
| State Rule Applicability - Entire Source |
|---|

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

326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)

PSD and Emission Offset applicability is discussed under the Potential to Emit After Issuance section of this document.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).

The operation of this source will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 2-8-4 (FESOP) and 326 IAC 20 (Hazardous Air Pollutants)

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

FESOP VOC Limit(s)

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable, the Permittee shall comply with the following:

- (a) The VOC input from the three (3) laminators (L1, L2, and Mini Laminators) shall not exceed 90 tons per twelve (12) consecutive month period.

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

FESOP HAP Limit(s)

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA), and render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the Permittee shall comply with the following:

Total input of any single HAP from the three (3) laminators (L1, L2 and Mini Laminator) shall be less than 9.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at the source, shall limit the source-wide potential to emit single HAP to less than 10 tons per twelve (12) consecutive month period and the source-wide potential to emit total HAPs to less than 25 tons per twelve (12) consecutive month period, and shall render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA) and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

326 IAC 5-1 (Opacity Limitations)

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

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

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

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

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

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

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

326 IAC 6.8 (Lake County: Fugitive Particulate Matter)

Pursuant to 326 IAC 6.8-10-1, this source (located in Ripley County) is not subject to the requirements of 326 IAC 6.8-10 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

State rule applicability has been reviewed as follows:

Laminators L1 and L2

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

The laminators are not subject to the requirements of 326 IAC 8-1-6 because it is regulated by other rules in 326 IAC 8. The laminators are subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations).

326 IAC 8-2-5 (Paper Coating Operations)

Pursuant to 326 IAC 8-2-1 (Applicability), this rule applies to facilities constructed after July 1, 1990, located in any county, and with potential emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. The two (2) laminators (L1 and L2 Laminators), which were constructed in 2006 and 2024 respectively are subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations), since each of them has potential emissions of greater than fifteen (15) pounds of VOC per day before add-on controls.

Pursuant to 8-2-5(b), no owner or operator of a coating line subject to this section may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, delivered to the coating applicator from a paper coating line.

The two (2) laminators (L1 and L2 Laminators) use coating with a VOC content of 1.35 pounds of VOC per gallon less water, therefore, can comply with this requirement.

326 IAC 8-5-5 (Graphic Arts Operations)

This source is not subject to requirements of 326 IAC 8-5-5 (Graphic Arts Operations) because this facility does not contain any packaging rotogravure, publication rotogravure, or flexographic printing sources.

Laminators L3 and Mini

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

Even though Laminator L3 and Mini laminator were constructed after January 1, 1980, they are not subject to the requirements of 326 IAC 8-1-6 because each units' unlimited VOC potential emissions are less than twenty-five (25) tons per year.

326 IAC 8-2-5 (Paper Coating Operations)

Pursuant to 326 IAC 8-2-1 (Applicability), this rule applies to facilities constructed after July 1, 1990, located in any county, and with potential emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. The two (2) laminators (L3 and L2 Laminators), which were constructed in 2024 are not subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations), since each of these laminators have potential emissions less than fifteen (15) pounds of VOC per day before add-on controls.

326 IAC 8-5-5 (Graphic Arts Operations)

This source is not subject to requirements of 326 IAC 8-5-5 (Graphic Arts Operations) because this facility does not contain any packaging rotogravure, publication rotogravure, or flexographic printing sources.

Boiler H2 and Laminator Dryers

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

Pursuant to 326 IAC 6-3-1(b)(14), the natural gas fired laminator dryers (L1D1, L1D2, L2D1, and L2D2) is not subject to the requirements of 326 IAC 6-3, since each of these units has potential particulate emissions less than 0.551 lb/hr.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

The particulate matter emissions (Pt) shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

- Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu).
- Q = Total source maximum operating capacity rating in MMBtu/hr heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

| Indirect Heating Units Which Began Operation After September 21, 1983 | | | | | | |
|--|-------------------------------------|----------------------------------|-----------------|-----------------------------|---|--|
| Facility | Construction Date (Removal Date) | Operating Capacity (MMBtu/hr) | Q (MMBtu/hr) | Calculated Pt (lb/MMBtu) | Particulate Limitation, (Pt) (lb/MMBtu) | PM PTE based on AP-42 (lb/MMBtu) |
| Units Operating Prior to 9/21/1983- Boilers CB-1 and CB-2 | CB-1: 1961 CB-2: 1967 (2024) | CB-1: 6.28 CB-2: 4.19 | 10.47 | 1.70 | 0.8 | 0.002 |
| Boiler H1 | 2006 (2024) | 1.25 | 18.62 | 0.51 | 0.51 | 0.002 |
| Dryer L1D1 | 2006 | 3.45 | | | | |
| Dryer L1D2 | 2006 | 3.45 | | | | |
| Dryer FEEC-D1 | 2019 (2024) | 3.45 | 25.51 | 0.47 | 0.47 | 0.002 |
| Dryer FEEC-D2 | 2019 (2024) | 3.45 | | | | |

| Indirect Heating Units Which Began Operation After September 21, 1983 | | | | | | |
|---|----------------------------------|-------------------------------|--------------|--------------------------|---|----------------------------------|
| Facility | Construction Date (Removal Date) | Operating Capacity (MMBtu/hr) | Q (MMBtu/hr) | Calculated Pt (lb/MMBtu) | Particulate Limitation, (Pt) (lb/MMBtu) | PM PTE based on AP-42 (lb/MMBtu) |
| Dryer L2D1 | 2024 | 3.45 | 14.45 | 0.54 | 0.54 | 0.002 |
| Dryer L2D2 | | 3.45 | | | | |
| Boiler H2 | | 0.65 | | | | |
| Where: Q = Includes the capacity (MMBtu/hr) of the new unit(s) and the capacities for those unit(s) which were in operation at the source at the time the new unit(s) was constructed. Note: Emission units shown in strikethrough were subsequently removed from the source. The effect of removing these units on "Q" is shown in the year the boiler was removed. | | | | | | |

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

This emission unit is not subject to 326 IAC 326 IAC 7-1.1 because it has a potential to emit (or limited potential to emit) sulfur dioxide (SO₂) of less than 25 tons per year or 10 pounds per hour.

Natural gas-fired Combustion

326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-1, the natural gas fired space heaters and makeup air units are not subject to the provision of 326 IAC 6-2-4, since these units are considered direct fired units.

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

The natural gas fired combustion units (space heaters) are exempt from the requirements of 326 IAC 6-3, because they each are not considered manufacturing processes as defined by 326 IAC 6-3-1.5.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

This emission unit is not subject to 326 IAC 326 IAC 7-1.1 because it has a potential to emit (or limited potential to emit) sulfur dioxide (SO₂) of less than 25 tons per year or 10 pounds per hour.

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

Even though, thses space heaters were constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

Grinding Operation

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

The maintenance and grinding operation, controlled by a baghouse DC1, is not subject to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because it is not part of manufacturing process.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to assure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance requirements applicable to this source.

Proposed Changes

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

The following changes were made to conditions contained previously issued permits/approvals (these changes may include Title I changes):

- (1) Due to the additional emissions from the new and modified units, the unlimited single HAP PTE increased beyond 10 tons/year. To render the requirements of 326 IAC 2-7 not applicable, IDEM OAQ has added a new HAP minor limitation in Condition D.1.2.
- (2) The description of existing laminator, L1 has been updated throughout the permit.

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 January 4, 2024.

The construction of this proposed revision shall be subject to the conditions of the attached proposed New Source Review and FESOP Renewal No. 137-47390-00022.

The operation of this stationary specialty paper manufacturing operation shall be subject to the conditions of the attached proposed FESOP Renewal No. 137-47390-00022.

The staff recommends to the Commissioner that the New Source Review and FESOP Renewal be approved.

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Taylor Wade, 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) 233-0868 or (800) 451-6027, and ask for Taylor Wade or (317) 233-0868.
- (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/public-participation/>; and the Citizens' Guide to IDEM on the Internet at: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>.

Appendix A: Emission Calculations
PTE Summary

Company Name: Case Makes
Source Address: 604 Railroad Ave, Osgood, Indiana 47037
Permit Number: F137-47390-00022
Reviewer: Taylor Wade

| Uncontrolled Potential to Emit (tons/yr) | | | | | | | | | | |
|--|--------------|--------------|--------------|-----------------|-------------|---------------|-------------|---------------------|--------------|--|
| Emission Unit | PM | PM10 | PM2.5 * | SO ₂ | NOx | VOC | CO | Highest Single HAP | Total HAPs | |
| Laminators (L1, L2, L3, Mini) | - | - | - | - | - | 183.14 | - | 11.53 Triethylamine | 11.53 | |
| Natural Gas-Fired Units | 0.17 | 0.67 | 0.67 | 0.05 | 8.82 | 0.49 | 7.41 | 0.16 Benzene | 0.17 | |
| Grinding Operation | 39.80 | 39.80 | 39.80 | - | - | - | - | - | - | |
| Paved Roads (Fugitive) | 1.03 | 0.21 | 0.05 | - | - | - | - | - | - | |
| Total PTE ** | 39.96 | 40.47 | 40.47 | 0.05 | 8.82 | 183.63 | 7.41 | 11.53 | 11.70 | |

| Potential to Emit after Issuance (tons/yr) | | | | | | | | | | |
|--|--------------|--------------|--------------|-----------------|-------------|--------------|-------------|--------------------|--------------|--|
| Emission Unit | PM | PM10 | PM2.5 * | SO ₂ | NOx | VOC | CO | Highest Single HAP | Total HAPs | |
| Laminators (L1, L2, L3, Mini) | - | - | - | - | - | 90.00 | - | 9.00 Triethylamine | 11.53 | |
| Natural Gas-Fired Units | 0.17 | 0.67 | 0.67 | 0.05 | 8.82 | 0.49 | 7.41 | 0.16 Benzene | 0.17 | |
| Grinding Operation | 39.80 | 39.80 | 39.80 | - | - | - | - | - | - | |
| Paved Roads (Fugitive) | 1.03 | 0.21 | 0.05 | - | - | - | - | - | - | |
| Total PTE ** | 39.96 | 40.47 | 40.47 | 0.05 | 8.82 | 90.49 | 7.41 | 9.00 | 11.70 | |

* PM2.5 listed is direct PM2.5

In order to render the requirements of 326 IAC 2-7 (Part 70 permits) not applicable, the input of VOC from three (3) laminators (L-1, L2 and Mini Laminator) shall not exceed 90 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

**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.

**Appendix A: Emission Calculations
Modification Summary**

Company Name: Case Makes
Source Address: 604 Railroad Ave, Osgood, Indiana 47037
Permit Number: F137-47390-00022
Reviewer: Taylor Wade

| Unlimited PTE Increase of Modified Existing Emissions Unit (tons/yr) | | | | | | | | |
|--|-------------|-------------|-------------|-----------------|-----------------|---------------|-------------|-------------|
| Emission Unit | PM | PM10 | PM2.5 * | SO ₂ | NO _x | VOC | CO | Total HAPs |
| Laminator #1 (After Modification) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 91.07 | 0.00 | 5.73 |
| Laminator #1 (Before Modification) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 72.85 | 0.00 | 4.59 |
| <i>Increase</i> | | | | | | 18.22 | | 1.14 |
| Unlimited PTE of Each New Emissions Unit (tons/yr) | | | | | | | | |
| Laminator #2 (L2) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 91.07 | 0.00 | 5.73 |
| Laminator #3 (L3) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Mini Laminator #1 (ML1) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 1.01 | 0.00 | 6.37E-02 |
| Natural Gas Boiler (H2) | 0.01 | 0.02 | 0.02 | 0.00 | 0.28 | 0.02 | 0.23 | 5.30E-03 |
| Laminator Dryer (L2D1) | 0.03 | 0.11 | 0.11 | 0.01 | 1.48 | 0.08 | 1.24 | 2.80E-02 |
| Laminator Dryer (L2D2) | 0.03 | 0.11 | 0.11 | 0.01 | 1.48 | 0.08 | 1.24 | 2.80E-02 |
| PTE Increase of New Units: | 0.06 | 0.25 | 0.25 | 0.02 | 3.24 | 92.26 | 2.72 | 5.86 |
| Unlimited PTE Increase Due to the Modification (tons/yr) | | | | | | | | |
| Total PTE Before Controls of the New Emission Units | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 18.22 | 0.00 | 1.14 |
| Total PTE Increase of the Modified Emission Unit(s)/Process | 0.06 | 0.25 | 0.25 | 0.02 | 3.24 | 92.26 | 2.72 | 5.86 |
| Total PTE of the Modification | 0.06 | 0.25 | 0.25 | 0.02 | 3.24 | 110.47 | 2.72 | 7.00 |

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

Company Name: Case Makes
Source Address: 604 Railroad Ave, Osgood, Indiana 47037
Permit Number: F137-47390-00022
Reviewer: Taylor Wade

| Emission Unit | Unit ID | Heat Input Capacity (MMBtu/hr) |
|---------------------------------------|---------|--------------------------------|
| Natural Gas Fired Space Heater (2021) | R6 | 0.05 |
| Makeup Air Unit (2023) | AA1 | 0.58 |
| Makeup Air Unit (2023) | AA2 | 0.58 |
| Makeup Air Unit (2023) | AA3 | 0.58 |
| TOTAL MMBtu/hr | | 1.80 |

| | | |
|---------------------------------|----------------|---------------------------------|
| Heat Input Capacity MMBtu/hr | mmBtu mmscf | Potential Throughput MMCF/yr |
| 1.80 | 1020 | 15.4 |

| Emission Factor in lb/MMCF | Pollutant | | | | | | |
|-------------------------------|-----------|----------|---------------|----------|--------------------|----------|------|
| | PM* | PM10* | direct PM2.5* | SO2 | NOx | VOC | CO |
| | 1.9 | 7.6 | 7.6 | 0.6 | 100 **see below | 5.5 | 84 |
| PTE of Space Heater (R6) | 4.06E-04 | 1.63E-03 | 1.63E-03 | 1.28E-04 | 0.02 | 1.18E-03 | 0.02 |
| PTE of Makeup Air units | 0.01 | 0.06 | 0.06 | 0.00 | 0.75 | 0.04 | 0.63 |
| Potential Emission in tons/yr | 0.01 | 0.06 | 0.06 | 0.00 | 0.77 | 0.04 | 0.65 |

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 PM2.5 emission factor is filterable and condensable PM2.5 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

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

Hazardous Air Pollutants (HAPs)

| | HAPs - Organics | | | | | |
|-------------------------------|-----------------|-----------------|--------------|---------|---------|------------------|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene | Total - Organics |
| Emission Factor in lb/MMcf | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 | |
| Potential Emission in tons/yr | 1.6E-05 | 9.3E-06 | 5.8E-04 | 0.01 | 2.6E-05 | 0.01 |

| | HAPs - Metals | | | | | |
|-------------------------------|---------------|---------|----------|-----------|---------|-------------------|
| | Lead | Cadmium | Chromium | Manganese | Nickel | Total - Metals |
| Emission Factor in lb/MMcf | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 | |
| Potential Emission in tons/yr | 3.9E-06 | 8.5E-06 | 1.1E-05 | 2.9E-06 | 1.6E-05 | 4.2E-05 |
| | | | | | | Total HAPs |
| | | | | | | 0.01 |
| | | | | | | Worst HAP |
| | | | | | | 0.01 |

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

**Appendix A: Emissions Calculations
from Laminators (L6 and FEEC Laminator)**

Company Name: Case Makes
Source Address: 604 Railroad Ave, Osgood, Indiana 47037
Permit Number: F137-47390-00022
Reviewer: Taylor Wade

| Equipment | Material ¹ | Maximum VOC Content ¹ % Wt | Web Properties (Worst Case) | | | Production Rate sq. ft/hr | Maximum Hours hr/yr | Potential VOC Emissions | |
|-------------------------|-----------------------------------|--|-----------------------------|-----------------|---------------|------------------------------|------------------------|--------------------------------------|---------------|
| | | | Speed ft/min | Web Width ft | Coverage % | | | Appl. Rate ² lb/sq. ft | lb/hr |
| Laminator #1 (L-1) | Confidential Coating 1 | 15.88% | 750 | 6 | 100% | 270,000 | 8,760 | 20.79 | 91.07 |
| Laminator #2 (L-2) | Confidential Coating 1 | 15.88% | 750 | 6 | 100% | 270,000 | 8,760 | 20.79 | 91.07 |
| Laminator #3 (L-3) | No Coating Mechanism ³ | - | 400 | 3.5 | - | - | - | - | - |
| Mini Laminator #1 (ML1) | Confidential Coating 1 | 15.88% | 50 | 1 | 100% | 3,000 | 8,760 | 0.23 | 1.01 |
| Total | | | | | | | | | 183.14 |

Notes

¹ Information on "Confidential Coating 1" has been submitted to the IDEM-OAQ as confidential information. This coating represents the worst-case coating used on the laminators for VOC emissions.
² Application rate is determined from information from the coating supplier.
³ There is not expected to be any HAP emissions associated with Laminator #3 as there is no coating used.

Methodology

Potential to Emit (lb/hr) = [Application Rate (lb/sq. ft)] * [Production Rate (sq. ft/hr)] * [Max. VOC Content (% Wt)]
 Potential to Emit (lb/yr) = [Potential Emissions (lb/hr)] * [Maximum Hours/Year]

Potential-to-Emit Calculations - Hazardous Air Pollutants (HAP)

| Equipment | Material ¹ | Maximum HAP Content (Triethylamine) % Wt | Web Properties (Worst Case) | | | Production Rate sq. ft/hr | Maximum Hours hr/yr | Potential HAP Emissions | |
|-------------------------|-----------------------------------|---|-----------------------------|-----------------|---------------|------------------------------|------------------------|--------------------------------------|--------------|
| | | | Speed ft/min | Web Width ft | Coverage % | | | Appl. Rate ² lb/sq. ft | lb/hr |
| Laminator #1 (L-1) | Confidential Coating 1 | 1.00% | 750 | 6 | 100% | 270,000 | 8,760 | 1.31 | 5.73 |
| Laminator #2 (L-2) | Confidential Coating 1 | 1.00% | 750 | 6 | 100% | 270,000 | 8,760 | 1.31 | 5.73 |
| Laminator #3 (L-3) | No Coating Mechanism ³ | 0.00% | 400 | 3.5 | - | - | - | - | - |
| Mini Laminator #1 (ML1) | Confidential Coating 1 | 1.00% | 50 | 1 | 100% | 3,000 | 8,760 | 0.01 | 0.06 |
| Total Haps | | | | | | | | | 11.53 |

Notes

¹ Information on "Confidential Coating 1" has been submitted to the IDEM-OAQ as confidential information. This coating represents the worst-case coating used on the laminators for VOC emissions.
² Application rate is determined from information from the coating supplier.

Methodology

Potential to Emit (lb/hr) = [Application Rate (lb/sq. ft)] * [Production Rate (sq. ft/hr)] * [Max. VOC Content (% Wt)]
 Potential to Emit (lb/yr) = [Potential Emissions (lb/hr)] * [Maximum Hours/Year]

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

Company Name: Case Makes
Source Address: 604 Railroad Ave, Osgood, Indiana 47037
Permit Number: F137-47390-00022
Reviewer: Taylor Wade

| Emission Unit | Unit ID | Heat Input Capacity (MMBtu/hr) |
|--------------------------------|---------|--------------------------------|
| Natural Gas Boiler | H2 | 0.65 |
| Natural Gas Fired Space Heater | R1 | 0.20 |
| Natural Gas Fired Space Heater | R2 | 0.20 |
| Natural Gas Fired Space Heater | R3 | 0.20 |
| Natural Gas Fired Space Heater | R4 | 0.20 |
| Natural Gas Fired Space Heater | R6 | 0.05 |
| Natural Gas Fired Space Heater | C1 | 0.90 |
| Natural Gas Fired Space Heater | C2 | 1.30 |
| Natural Gas Fired Space Heater | C3 | 1.30 |
| Makeup Air Unit | AA1 | 0.58 |
| Makeup Air Unit | AA2 | 0.58 |
| Makeup Air Unit | AA3 | 0.58 |
| Laminator Dryer | L1D1 | 3.45 |
| Laminator Dryer | L1D2 | 3.45 |
| Laminator Dryer | L2D1 | 3.45 |
| Laminator Dryer | L2D2 | 3.45 |
| TOTAL MMBtu/hr | | 20.55 |

Heat Input Capacity
MMBtu/hr
20.55

mmBtu
mmscf
1020

Potential Throughput
MMCF/yr
176.5

| Emission Factor in lb/MMCF | Pollutant | | | | | | |
|-----------------------------------|-----------|----------|---------------|----------|-------------|----------|------|
| | PM* | PM10* | direct PM2.5* | SO2 | NOx 100 | VOC | CO |
| | 1.9 | 7.6 | 7.6 | 0.6 | 100 | 5.5 | 84 |
| | | | | | **see below | | |
| PTE of Boiler (H2) | 0.01 | 0.02 | 0.02 | 1.67E-03 | 0.28 | 0.02 | 0.23 |
| PTE of Space Heater (R6) | 4.06E-04 | 1.63E-03 | 1.63E-03 | 1.28E-04 | 0.02 | 1.18E-03 | 0.02 |
| PTE of Makeup Air unit | 4.76E-03 | 0.02 | 0.02 | 1.50E-03 | 0.25 | 0.01 | 0.21 |
| PTE each of Laminator Dryers (L2) | 0.03 | 0.11 | 0.11 | 0.01 | 1.48 | 0.08 | 1.24 |
| Potential Emission in tons/yr | 0.17 | 0.67 | 0.67 | 0.05 | 8.82 | 0.49 | 7.41 |

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

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

Hazardous Air Pollutants (HAPs)

| | HAPs - Organics | | | | | Total - Organics |
|-------------------------------|-----------------|-----------------|--------------|---------|---------|------------------|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene | |
| Emission Factor in lb/MMcf | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 | |
| Potential Emission in tons/yr | 1.9E-04 | 1.1E-04 | 6.6E-03 | 0.16 | 3.0E-04 | 0.17 |

| | HAPs - Metals | | | | | Total - Metals |
|-------------------------------|---------------|---------|----------|-----------|-------------------|----------------|
| | Lead | Cadmium | Chromium | Manganese | Nickel | |
| Emission Factor in lb/MMcf | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 | |
| Potential Emission in tons/yr | 4.4E-05 | 9.7E-05 | 1.2E-04 | 3.4E-05 | 1.9E-04 | 4.8E-04 |
| | | | | | Total HAPs | 0.17 |
| | | | | | Worst HAP | 0.16 |

Methodology is the same as above.

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

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

Appendix A: Emission Calculations
Grinding Operations

Company Name: Case Makes
Source Address: 604 Railroad Ave, Osgood, Indiana 47037
Permit Number: F137-47390-00022
Reviewer: Taylor Wade

| Baghouse ID | Pollutant | Outlet Grain Loading (gr/dscf) | Air Flow Rate (acfm) | Control Efficiency (%) | Potential Controlled Emissions (lb/hr) | Potential Controlled Emissions (tons/yr) | Potential Uncontrolled Emissions (lb/hr) | Potential Uncontrolled Emissions (tons/year) |
|-------------|---------------|--------------------------------|----------------------|------------------------|--|--|--|--|
| DC-1 | PM/PM10/PM2.5 | 0.01 | 5,300 | 95% | 0.45 | 1.99 | 9.09 | 39.80 |
| | Total | | | | 0.45 | 1.99 | 9.09 | 39.80 |

Methodology

Potential Controlled Emissions (lb/hr) = Outlet Grain Loading (gr/dscf) x Air Flow (acfm) x 60 (min/hour) x (1 lb/7000 grains)
 Potential Controlled Emissions (tons/year) = Potential Controlled Emissions (lb/hr) x 8760 (hours/year) x (1 ton/2000 lbs)
 Potential Uncontrolled Emissions (lb/hr) = Potential Controlled Emissions (lb/hr) / (1 - Control Efficiency)
 Potential Uncontrolled Emissions (ton/year) = Potential Uncontrolled Emissions (lb/hr) x 8760 (hours/year) x (1 ton/2000 lbs)

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

Company Name: Case Makes
Source Address: 604 Railroad Ave, Osgood, Indiana 47037
Permit Number: F137-47390-00022
Reviewer: Taylor Wade

Paved Roads at Industrial Site

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

Vehicle Information (provided by source)

| Type | Maximum number of vehicles per day | Number of one-way trips per day per vehicle | Maximum trips per day (trip/day) | Maximum Weight of Loaded Vehicle (tons/trip) | Total Weight driven per day (ton/day) | Maximum one-way distance (feet/trip) | Maximum one-way distance (mi/trip) | Maximum one-way miles (miles/day) | Maximum one-way miles (miles/yr) |
|---|------------------------------------|---|----------------------------------|--|---------------------------------------|--------------------------------------|------------------------------------|-----------------------------------|----------------------------------|
| Vehicle (entering plant) (one-way trip) | 20.0 | 1.0 | 20.0 | 22.0 | 440.0 | 700 | 0.133 | 2.7 | 967.8 |
| Vehicle (leaving plant) (one-way trip) | 20.0 | 1.0 | 20.0 | 22.0 | 440.0 | 100 | 0.018 | 0.4 | 138.3 |
| Totals | | | 40.0 | | 880.0 | | | 3.0 | 1106.1 |

Average Vehicle Weight Per Trip = $\frac{22.0 \text{ tons/trip}}{20.0 \text{ vehicles/trip}} = 1.1 \text{ tons/vehicle}$
 Average Miles Per Trip = $\frac{22.0 \text{ miles/trip}}{20.0 \text{ vehicles/trip}} = 1.1 \text{ miles/vehicle}$

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

| PM | PM10 | PM2.5 |
|-----------|--------|---------|
| k = 0.011 | 0.0022 | 0.00054 |
| W = 22.0 | 22.0 | 22.0 |
| sL = 9.7 | 9.7 | 9.7 |

where k = lb/MMT = particle size multiplier (AP-42 Table 13.2.1-1)
 W = tons = average vehicle weight
 sL = g/m² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{mf} = E_f * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, $E_{mf} = \frac{125}{365} * [1 - (p/4N)]$

where p = days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
 N = days per year

| PM | PM10 | PM2.5 |
|---|-------|--------|
| Unmitigated Emission Factor, $E_f = 2.035$ | 0.407 | 0.0999 |
| Mitigated Emission Factor, $E_{mf} = 1.861$ | 0.372 | 0.0914 |

| Process | Mitigated PTE of PM (Before Control) (tons/yr) | Mitigated PTE of PM10 (Before Control) (tons/yr) | Mitigated PTE of PM2.5 (Before Control) (tons/yr) | Totals |
|---|--|--|---|--------|
| Vehicle (entering plant) (one-way trip) | 0.90 | 0.18 | 0.04 | |
| Vehicle (leaving plant) (one-way trip) | 0.13 | 0.03 | 0.01 | |
| Totals | 1.03 | 0.21 | 0.05 | |

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight of Loaded Vehicle (tons/trip)] * [Maximum trips per day (trip/day)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/day) = [Maximum trips per day (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per day (trip/day)]
 Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Mitigated PTE (Before Control) (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Mitigated PTE (After Control) (tons/yr) = [Mitigated PTE (Before Control) (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

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

**Appendix A: Emissions Calculations
326 IAC Article 6-2 Particulate Emission Limitations
for Sources of Indirect Heating**

Company Name: Case Makes
Source Address: 604 Railroad Ave, Osgood, Indiana 47037
Permit Number: F137-47390-00022
Reviewer: Taylor Wade

| ID# | Year Constructed | Fuel Combusted | Maximum Heat Input Capacity (MMBtu/hr) (Q) | Q _T (MMBtu/hr) | Calculated Pt (lb/MMBtu) | Particulate Limitation, (Pt) (lb/MMBtu) | Applicability Test |
|------|------------------|----------------|--|---------------------------|--------------------------|---|--------------------|
| L1D1 | 2006 | NG | 3.45 | Q4 | 0.51 | 0.51 | QT > 10 |
| L1D2 | 2006 | NG | 3.45 | Q5 | 0.51 | 0.51 | |
| L2D1 | 2024 | NG | 3.45 | Q6 | 0.54 | 0.54 | QT > 10 |
| L2D2 | 2024 | NG | 3.45 | Q7 | 0.54 | 0.54 | |
| H2 | 2024 | NG | 0.65 | Q8 | 0.54 | 0.54 | |

Methodology

NG = natural gas
 If Q_T < 10 MMBtu/hr, Pt shall not exceed 0.6.
 If Q_T > 10 MMBtu/hr, then:
 $Pt = 1.09 / Q_T^{0.26}$

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