INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr. Governor

els Jr.

Thomas W. Easterly Commissioner 100 North Senate Avenue Indianapolis, Indiana 46204 (317) 232-8603 Toll Free (800) 451-6027 www.idem.IN.gov

TO: Interested Parties / Applicant

DATE: July 29, 2010

RE: Core Ventures, Inc. / 003-28992-00339

FROM: Matthew Stuckey, Branch Chief Permits Branch Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures FNPER.dot12/03/07



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Commissioner

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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

Core Ventures, Inc. 3840 East Pontiac St. Fort Wayne, Indiana 46803

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

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

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

Operation Permit No.: M003-28992-00339	
Issued by: Appendiduzy	Issuance Date: July 29, 2010
Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Expiration Date: July 29, 2020

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary isocure core manufacturing plant.

Source Address: General Source Phone Number: SIC Code:	3840 East Pontiac Street, Fort Wayne, Indiana 46803 260-748-4477 3453
County Location: Source Location Status:	Allen Attainment for all criteria pollutants Minor Source Operating Parmit Program
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary This stationary source consists of the following emission units and pollution control devices:

- (a) Five (5) polyurethane cold box core machines, identified as C1 through C5, constructed in 2006, each with a maximum production rate of 1.2 tons of sand cores per hour, using DMIPA as a catalyst gas, and exhausting through stacks S1 through S3.
- (b) Six (6) Redford Shell Core machines, identified as C6 through C11, constructed in 2007, each with a maximum capacity of 0.1125 tons of core sand per hour and 150,000 Btu/hr, exhausting through general roof exhaust vents.
- (c) Three (3) Shell Core machines, identified as C12 through C14, approved for construction in 2010, each with a maximum capacity of 0.15 tons of core sand per hour and 250,000 Btu/hr, exhausting through general roof exhaust vents.
- (d) One (1) resin/sand batch mixer, identified as EU-M1, constructed in 2006, with a maximum capacity of 7,500 pounds of sand per hour and controlled by one (1) dust collector exhausting to the outside.
- (e) One (1) drying oven, approved for construction in 2010, with a maximum capacity of 500,000 Btu/hr and exhausting through stack S4.
- (f) One (1) core release spray operation, constructed in 2006, with a maximum core release agent usage of 1,049 gallons per year, applying the core release agent by air atomized spray guns.
- (g) One (1) shell core release spray operation, constructed in 2007, with a maximum capacity of 14 gallons of emulsion per year.
- (h) One (1) water-based core wash operation, identified as CW, constructed in 2006, with a maximum cleaner usage of 16,828 gallons per year.
- (i) One (1) mold cleaning operation, constructed in 2006, with a maximum mold cleaner usage of 591 gallons per year, applying the mold cleaner with spray air atomized guns.

SECTION B GENERAL CONDITIONS

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

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

- B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]
 - (a) This permit, M003-28992-00339, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
 - (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.
- B.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.
- B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

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

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

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

- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- B.9 Preventive Maintenance Plan [326 IAC 1-6-3]
 - (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The Permittee shall implement the PMPs.

- A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.
- B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]
 - (a) All terms and conditions of permits established prior to M003-28992-00339 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
 - (b) All previous registrations and permits are superseded by this permit.

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

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

- B.12 Permit Renewal [326 IAC 2-6.1-7]
 - (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

(c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.15 Inspection and Entry

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

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

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

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

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

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

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

- (c) The Permittee may implement notice-only changes addressed in the request for a noticeonly change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]
- B.17 Annual Fee Payment [326 IAC 2-1.1-7]
 - (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
 - (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.
- B.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Permit Revocation [326 IAC 2-1.1-9]

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

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

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

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

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

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

- C.8 Performance Testing [326 IAC 3-6]
 - (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date.

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

- C.11 Instrument Specifications [326 IAC 2-1.1-11]
 - (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
 - (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an

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

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.
- C.13 Actions Related to Noncompliance Demonstrated by a Stack Test
 - (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
 - (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
 - (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

C.14 Malfunctions Report [326 IAC 1-6-2] Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.
- C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]
 - (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1]:

- (a) Six (6) Redford Shell Core machines, identified as C6 through C11, constructed in 2007, each with a maximum capacity of 0.1125 tons of core sand per hour and 150,000 Btu/hr, exhausting through general roof exhaust vents.
- (b) Three (3) Shell Core machines, identified as C12 through C14, approved for construction in 2010, each with a maximum capacity of 0.15 tons of core sand per hour and 250,000 Btu/hr, and exhausting through general roof exhaust vents.

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

Emission Limitations and Standards [326 IAC 2-6.1]

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

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each of the shell core machines C6 through C11 shall not exceed 0.95 lbs/hr when operating at a process weight rate of 0.112 tons per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each of the shell core machines C12-C14 shall not exceed 1.15 lbs/hour when operating at a process weight rate of 0.15 tons per hour.

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

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

 $E = 4.10 P^{0.67}$

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1]:

(a) One (1) resin/sand batch mixer, identified as EU-M1, constructed in 2006, with a maximum capacity of 7,500 pounds of sand per hour and controlled by one (1) dust collector exhausting to the outside.

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

Emission Limitations and Standards [326 IAC 2-6.1]

- D.2.1 Particulate Emission Limitations [326 IAC 6-3-2]
 - (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the mixer EU-M1 shall not exceed 9.94 lbs/hr when operating at the process weight rate of 3.75 tons per hour.

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

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

 $E = 4.10 P^{0.67}$

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

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

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

Compliance Determination Requirements

D.2.3 Particulate Control [326 IAC 6-3-2 Particulate Emission Limitations for Manufacturing Processes] In order to comply with Condition D.2.1, the dust collector for particulate control shall be in operation and control emissions from the mixer EU-M1 at all times that the mixer EU-M1 is in operation.

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

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the resin/sand batch mixer, identified as EU-M1, shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.5 Baghouse Inspections

An inspection shall be permformed each calendar quarter of the bag(s) controlling the resin/sand batch mixer.

D.2.6 Broken or Failed Bag Detection

For a single compartment baghouses or dust collectors, controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emisisons unit shall be shut down no later than the completion of the processing of the material in the line. Section C -Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

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

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

- D.2.7 Record Keeping Requirements
 - (a) To document the compliance status with Condition D.2.4, the Permittee shall maintain daily records of the visible emission notations of the resin/sand batch mixer, EU-M1, stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).
 - (b) To document the compliance status of Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5.
 - (c) Section C General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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

MINOR SOURCE OPERATING PERMIT ANNUAL NOTIFICATION

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

Company Name:	Core Ventures, Inc.
Address:	3840 East Pontiac St.
City:	Fort Wayne, Indiana 46803
Phone #:	260-748-4477
MSOP #:	M003-28992-00339

I hereby certify that Core Ventures, Inc. is :

I hereby certify that Core Ventures, Inc. is :

still in operation.no longer in operation.

in compliance with the requirements of MSOP M003-28992-00339.
 not in compliance with the requirements of MSOP M003-28992-00339.

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

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

Noncompliance:		

MALFUNCTION REPORT

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

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

THIS FACILITY MEETS THE APPLICABILITY REQUI PARTICULATE MATTER ?, 25 TONS/YEAR S 25 TONS/YEAR VOC ?, 25 TONS/YEAR HYDR ?, 25 TONS/YEAR REDUCED SULFUR COMP CARBON MONOXIDE ?, 10 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? ELEMENTAL LEAD ?, OR IS A SOURCE LISTE MALFUNCTIONING CONTROL EQUIPMENT OR PR LIMITATION	ULFUR DIOXIDE ? ROGEN SULFIDE ? POUNDS ?, 2 SINGLE HAZARDO , 1 TON/YEAR L ED UNDER 326 IAO	, 25 TONS/YEA , 25 TONS/YEA 5 TONS/YEAR FLUOF DUS AIR POLLUTANT EAD OR LEAD COMF 2 2-5.1-3(2) ? E	R NITROGEN O R TOTAL REDUC RIDES ?, 1 ?, 25 TON POUNDS MEASU MISSIONS FRO	XIDES?, CED SULFUR 00 TONS/YEAR NS/YEAR ANY JRED AS
THIS MALFUNCTION RESULTED IN A VIOLATION OPERMIT LIMIT OF	DF: 326 IAC	OR, PERMIT CONE	DITION #	_ AND/OR
THIS INCIDENT MEETS THE DEFINITION OF "MALF	FUNCTION" AS LIS	TED ON REVERSE S	IDE? Y	Ν
THIS MALFUNCTION IS OR WILL BE LONGER THAT	N THE ONE (1) HO	UR REPORTING REC	UIREMENT ?	Y N
		PHONE NO.	()	
LOCATION: (CITY AND COUNTY) PERMIT NOAFS PLANT ID: CONTROL/PROCESS DEVICE WHICH MALFUNCTION	AFS	S POINT ID: I:	INSP	
DATE/TIME MALFUNCTION STARTED:/				
DATE/TIME CONTROL EQUIPMENT BACK-IN SERV	/ICE/	/ 20	AM/PM	
TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SC	02, VOC, OTHER: <u></u>			
ESTIMATED AMOUNT OF POLLUTANT EMITTED DU	RING MALFUNCTI	ON:		·····
MEASURES TAKEN TO MINIMIZE EMISSIONS:				
REASONS WHY FACILITY CANNOT BE SHUTDOWN	DURING REPAIRS	:		
CONTINUED OPERATION REQUIRED TO PROVIDE <u>E</u> CONTINUED OPERATION NECESSARY TO PREVEN CONTINUED OPERATION NECESSARY TO PREVEN INTERIM CONTROL MEASURES: (IF APPLICABLE)	T INJURY TO PER	SONS: GE TO EQUIPMENT:		
MALFUNCTION REPORTED BY: (SIGNATURE IF FAXED)		_TITLE:		
MALFUNCTION RECORDED BY:	DATE:	TIME	::	

PAGE 1 OF 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

PAGE 2 OF 2

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (ATSD) for a Minor Source Operating Permit Renewal

Source Background and Description		
Source Name:	Core Ventures, Inc.	
Source Location:	3840 East Pontiac Street, Fort Wayne, IN 46803	
County:	Allen	
SIC Code:	3453	
Operation Permit No.:	M 003-28992-00339	
Permit Reviewer:	Deborah Cole	

On June 22, 2010, the Office of Air Quality (OAQ) had a notice published in Fort Wayne Journal Gazette in Fort Wayne, Indiana, stating that Core Ventures, Inc. had applied for a Minor Source Operating Permit Renewal to operate a stationary isocure manufacturing plant. The notice also stated that the OAQ proposed to issue a Minor Source Operating Permit Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

On July 19, 2010, Amanda Hennessy of KERAMIDA submitted comments to IDEM, OAQ on the draft Minor Source Operating Permit Renewal.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as strikeouts and new language **bolded**.

Comment 1:

Permit Conditions D.2.4 through D.2.6

During the permit review, it was discussed that visible emission notations were not an appropriate monitoring mechanism for this type of collection device. During this permit review and based on the above situation, an alternative, site specific monitoring requirement for this control device was discussed and agreed to by both IDEM and Core Ventures. During this discussion, it was understood that this site specific inspection condition would replace both the visible emission notation condition and the quarterly inspection condition. It that is not the case and IDEM intends to still require daily visible emission notations, then we request that IDEM replace the site specific condition with the traditional model language calling for quarterly inspections and not prescribing the exact items to be inspected.

Response to Comment 1:

IDEM agrees with the recommended changes because IDEM believes that the visible emission permit condition should be retained in the permit. The permit has been revised as follows:

D.2.5 Dust Collector Inspection

 	eeneeter mepeet	
 (a)	An inspection	of the bag(s) controlling emissions from the resing/sand batch
	mixer, EU-M1,	shall be performed monthly. At a minimum, the inspections shall
	include the foll	owing:
	(1)	Check clamps at the top and bottom of flange for leaks
	(2)	Inspect bag for holes and/or damage
	(3)	Check drum attachment for leaks
	(4)	Inspect ductwork between blower and bag for leaks
	. ,	

D.2.5 Baghouse Inspections

An inspection shall be permformed each calendar quarter of the bag(s) controlling the resin/sand batch mixer.

D.2.6 Broken or Failed Bag Detection

For a single compartment baghouses or dust collectors, controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emisisons unit shall be shut down no later than the completion of the processing of the material in the line. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition.

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

Comment 2:

Calculations in the Appendix A for the Technical Support Document - Page 9 of 11 - Calculations for the Resin/Sand Batch Mixer.

The box titled Controlled Potential Emissions (lbs/hr) should be Uncontrolled Potential Emissions (lb/hr) as that emission rate is based on the emission factor and the hourly capacity without apply a control rate.

Response to Comment 2:

IDEM agrees with the recommended changes because IDEM believes that this was a typographical error The calculation sheet has been corrected and is attached to this ATSD.

IDEM Contact

- (a) Questions regarding this proposed Minor Source Operating Permit Renewal can be directed to Deborah Cole at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5377 or toll free at 1-800-451-6027 extension 4-5377.
- (b) A copy of the permit is available on the Internet at: <u>http://www.in.gov/ai/appfiles/idem-caats/</u>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: <u>www.idem.in.gov</u>

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit Renewal

Source Description and Location

Source Name: Source Location: County: SIC Code: Permit Renewal No.: Permit Reviewer: Core Ventures, Inc. 3840 East Pontiac Street, Ft. Wayne, IN 46803 Allen 3453 M003-28992-00339 Deborah Cole

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Core Ventures, Inc. relating to the operation of a stationary isocure core manufacturing plant.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) New Construction MSOP No. 003-21849-00339, issued on February 7, 2006
- (b) Notice Only Change No. 003-26716-00339, issued on July 22, 2008

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.

County Attainment Status

The source is located in Allen County.

Pollutant	Designation	
SO ₂	Better than national standards.	
CO	Unclassifiable or attainment effective November 15, 1990.	
O3	Attainment effective February 12, 2007, for the Fort Wayne area, including	
	Allen County, for the 8-hour	
	ozone standard.1	
PM ₁₀	Unclassifiable effective November 15, 1990.	
NO ₂	Cannot be classified or better than national standards.	
Pb	Not designated.	
Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which		
was revoked effective June 15, 2005.		

(a) Ozone Standards

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

(b) Allen County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements.

The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

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

Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard 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.

Permitted Emission Units and Pollution Control Equipment

On February 19, 2010, Core Ventures, Inc. submitted an application to the OAQ requesting to renew its operating permit. Core Ventures, Inc. was issued a New Source Construction and MSOP on February 7, 2006.

On July 22, 2008, Core Ventures was issued a Notice Only Change relating to construction and operation of six (6) new Redford HS16 Shell Core Machines

The source consists of the following permitted emission unit(*s*):

- (a) Five (5) polyurethane cold box core machines, identified as C1 through C5, constructed in 2006, each with a maximum production rate of 1.2 tons of sand cores per hour, using DMIPA as a catalyst gas, and exhausting through stacks S1 through S3.
- (b) Six (6) Redford Shell Core machines, identified as C6 through C11, constructed in 2007, each with a maximum capacity of 0.1125 tons of core sand per hour and 150,000 Btu/hr, exhausting through general roof exhaust vents.
- (c) One (1) resin/sand batch mixer, identified as EU-M1, constructed in 2006, with a maximum capacity of 7,500 pounds of sand per hour and controlled by one (1) dust collector exhausting to the outside.
- (d) One (1) core release spray operation, constructed in 2006, with a maximum core release agent usage of 1,049 gallons per year, applying the core release agent by air atomized spray guns.
- (e) One (1) shell core release spray operation, constructed in 2007, with a maximum capacity of 14 gallons of emulsion per year.
- (f) One (1) water-based core wash operation, identified as CW, constructed in 2006, with a maximum cleaner usage of 16,828 gallons per year.
- (g) One (1) mold cleaning operation, constructed in 2006, with a maximum mold cleaner usage of 591 gallons per year, applying the mold cleaner with spray air atomized guns.
- Note: This source does not have a process for sand handling, making sand molds or core mixing. There is no dip tank in the process. No additives are used in the process to change the properties of the metal and there are no pouring, casting, cooling or shake-out lines in the process.

New Emission Units and Pollution Control Equipment

The source also consists of the following emission units:

- (a) Three (3) Shell Core machines, identified as C12 through C14, approved for construction in 2010, each with a maximum capacity of 0.15 tons of core sand per hour and 250,000 Btu/hr, exhausting through general roof exhaust vents.
- (b) One (1) drying oven, approved for construction in 2010, with a maximum capacity of 500,000 Btu/hr and exhausting through stack S4.
- Note: The uncontrolled potential PM and PM10 emissions from the three (3) shell core machines, identified as C12 through C14, and the one (1) drying oven, are each less than the Exemption threshold values of five (5) tons per year, as demonstrated in Appendix A of this TSD. Therefore, pursuant to 326 IAC 2-1.1-3(e)(1)(A), the source was not required to submit an application for the addition of the emission unit.

Emission Units and Pollution Control Equipment Removed From the Source

No emission units listed in this or any previous permit have been removed from the source.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
VOC	64.65
PM	65.71
PM10 ⁽¹⁾	12.06
PM2.5	12.06
СО	0.79
NO _x	1.50
SO2	0.37

 Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)		
Single	<10		
Combined	<25		

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.

- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (c) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

No previous emission data has been received from the source.

PTE of the Entire Source After Issuance of the MSOP

The table below summarizes the potential to emit of the entire source after issuance of this MSOP, reflecting all limits, of the emission units.

	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)								
Process/ Emission Unit	VOC	PM	PM10	PM2.5	со	NOx	SO2	Total HAPs	Worst Single HAP
Cold Box Core Machines C1-C5	60.97	0	0	0	0	0	0.00	negl.	
Shell Core Machines C6-C11	0.81	2.43	0.36	0.36	0	0.34	0.22	0.81	0.81
Shell Core Combustion C6-C11	0.02	0.01	0.03	0.03	0.33	0.39	0	negl.	
Shell Core Machines C12-C14	0.54	1.62	0.24	0.24	0	0.23	0.14	0.54	
Shell Core Combustion C12-C14	0.02	0.01	0.02	0.02	0.28	0.33	0	negl.	
Resin/Sand Batch Mixer M-1	0	59.13	8.87	8.87	0	0	0	negl.	
Drying Oven Combustion	0.012	0.0042	0.0166	0.0166	0.1840	0.22	0.0013	negl.	
Core Release Spray Operation	0.04	2.37	2.37	2.37	0	0	0	negl.	
Shell Core Release	0.03	0.02	0.02	0.02	0	0	0	negl.	
Water-based Core Wash CW	0	0	0	0	0	0	0	negl.	
Mold Cleaning Operation	2.20	0.12	0.12	0.12	0	0	0	negl.	
Total PTE of Entire Source	64.65	65.71	12.06	12.06	0.79	1.50	0.37	1.35	
Title V Major Source Thresholds	100	NA	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA

negl. = negligible

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". Assume PM10=PM2.5 in the absence of specific emission factors.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

There are no New Source Performance Standards [NSPS 40 CFR Part 60] included in this renewal.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

(a) <u>40 CFR 63 Subpart EEEEE—NESHAP for Iron and Steel Foundries</u>

The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Iron and Steel Foundries, 40 CFR 63.7680, Subpart EEEEE, defines an iron and steel foundry as a facility that melts scrap, ingot, and/or other forms of iron and steel and pours the resulting molten metal into molds to produce final or near final shape products for introduction into commerce.

This facility uses a cold box core process and a shell core process to produce cores. The cold box process produces a resin-bonded foundry core by mixing sand and resin and sand and hardener which are then mixed together to produce the final mixture which is then blown into the mold cavity. The shell core process uses a resin coated silica sand which is blown into an iron corebox which is preheated to 550° F. The core cures and becomes rigid as a result of the reaction between the resin and the heat. Neither of these processes uses molten metals of any sort to produce their product.

Therefore, the requirements of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Iron and Steel Foundries, 40 CFR 63.7680, Subpart EEEEE are not included in this permit because the source does not meet the definition of an iron and steel foundry. Further, this source is not a major source of HAPs.

(b) <u>40 CFR 63, Subpart ZZZZZ - NESHAP for Iron and Steel Foundries Area Sources</u> The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Iron and Steel Foundries Area Sources, 40 CFR 63.10880, Subpart ZZZZZ defines an iron and steel foundry as a facility that melts scrap, ingot and/or other forms of iron and steel and pours the resulting molten metal into molds to produce final or near final shape products for introduction into commerce. Also, it is not an area source for Hazardous Air Pollutant (HAP) emissions.

This facility uses a cold box core process and a shell core process to produce cores. The cold box process produces a resin-bonded foundry core by mixing sand and resin and sand and hardener which are then mixed together to produce the final mixture which is then blown into the mold cavity. The shell core process uses a resin coated silica sand which is blown into an iron corebox which is preheated to 550° F. The core cures and becomes rigid as a result of the reaction between the resin and the heat. Neither of these processes uses molten metals of any sort to produce their product.

Therefore, the requirements of National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Iron and Steel Foundries, 40 CFR 63.7680, Subpart ZZZZZ are not included in this permit because the source does not meet the definition of an iron and steel foundry nor is it a area source of HAPs.

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

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD)) This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting) Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, the requirements of 326 IAC 2-6 do not apply.
- (d) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP)) MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (e) 326 IAC 5-1 (Opacity Limitations) Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 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.

Cold Box Core Machines

 (a) <u>326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)</u> The potential VOC emissions from each of the five (5) cold box core machines, identified as C1 through C5, is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

Shell Core Machines C6 through C11

(a) <u>326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)</u> Pursuant to 326 IAC 6-3-1(a), (Particulate Emissions from Manufacturing Processes) the allowable particulate emission rate from each shell core machines C6 -C11 shall not exceed 0.95 pounds per hour when operating at a process weight rate of 0.112 tons per hour (224 pounds per hour). Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and <math>P = process weight rate in tons per hour

Based on Appendix A, the potential PM emissions from shell core machines C6 through C11 are 0.554 lbs/hour which is less than the allowable 0.95 pounds of PM per hour. Consequently, the shell core machines identified as C6 through C 11 are in compliance with this rule.

(b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) The unlimited VOC potential emissions of each Shell Core Machines identified as C-6 through C-11 are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

Shell Core Machines C12 through C14

 (a) <u>326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)</u> Pursuant to 326 IAC 6-3-1(a) (Particulate Emissions from Manufacturing Processes), the allowable particulate emission rate from each shell core machines C12 -C14 shall not exceed 1.15 pounds per hour when operating at a process weight rate of 0.15 tons per hour (300 pounds per hour).

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

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

Based on Appendix A, the potential PM emissions from shell core machines C12 through C14 are 0.369 lbs/hour which is less than the allowable 1.15 pounds of PM per hour. Consequently, the shell core machines identified as C12 through C 14 are in compliance with this rule.

(b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) The unlimited VOC potential emissions of each new unit, Shell Core Machines identified as C-12 through C-14 are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

Core Release Spray Operation

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) Pursuant to 326 IAC 6-3-2(d)(4) surface coating manufacturing processes that use less than 5 gallons of coating per day are subject to 326 IAC 6-3-2. The total potential coating usage from the core release agent is less than five (5) gallons per day:
 - 0.12 gal/hr X 24/day=2.88 gallons/day

Therefore, the requirements of 326 IAC 6-3-2(d)(4) do not apply.

 (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) The potential VOC emissions of the core release agent spray operation are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

Mixer M-1

(a) <u>326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)</u> Pursuant to 326 IAC 6-3-1(a), (Particulate Emissions from Manufacturing Processes) the allowable particulate emission rate from the sand/resin mixer, M-1, shall not exceed 9.94 pounds per hour when operating at a process weight rate of 3.75 tons per hour (7500 pounds per hour).

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

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

Based on Appendix A, the uncontrolled potential PM emissions from the mixing process are 13.5 lbs/hour which is greater that the 9.94 lbs/hour limit established by 326 IAC 6-3-2.

Therefore, the dust collector must be operated at all times when the mixer, identified as EU-M1, is in operation in order to comply with this limit.

Mold Cleaning Operation

- (a) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) The potential VOC emissions of the mold cleaner are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.
- (b) 326 IAC 8-3 (Organic Solvent Degreasing Operation) The molds will not be cleaned in organic solvent degreaser and the mold cleaner will be applied with spray guns. Therefore, the requirements of 326 IAC 8-3 (Organic Solvent Degreasing Operation) are not applicable.
- (c) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) Pursuant to 326 IAC 6-3-2(d)(4) surface coating manufacturing processes that use less than 5 gallons of coating per day are subject to 326 IAC 6-3-2. The total potential coating usage from the mold cleaning operation is less than five (5) gallons per day:

0.07 gal/hr X 24/day=1.68 gallons/day

Therefore, the requirements of 326 IAC 6-3-2(d)(4) do not apply.

Compliance Determination Requirements

The dust collector for particulate control for the resin/sand batch mixer, identified as EU-M1 shall be in operation at all times the mixer is in operation and shall control emissions from the mixer.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on February 19, 2010

The operation of this isocure core manufacturing plant shall be subject to the conditions of the attached Minor Source Operating Permit Renewal No. 003-28992-00339. The staff recommends to the Commissioner that this MSOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Deborah Cole at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5377 or toll free at 1-800-451-6027 ext. 4-5377 or dcole@idem.in.gov.
- (b) A copy of the findings is available on the Internet at: <u>http://www.in.gov/ai/appfiles/idem-caats/</u>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: <u>www.idem.in.gov</u>

Appendix A: Emission Calculations Emissions Summary

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Company Name:Core Ventures, Inc.Address City IN Zip:3840 East Pontiac Street, Fort Wayne, IN 46803Permit Number:003-28992-00339Plt ID:003-00339Reviewer:Deborah ColeDate:March 9, 2010

		Uncontrolled Emissions (tpy)							
Process	Unit ID	VOC	PM	PM10	PM 2.5	CO	NOx	SO2	HAP
Cold Box Core Machines	C1 - C5	60.97	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Shell Core Machines	C6 - C11	0.81	2.43	0.36	0.36	0.00	0.34	0.22	0.81
Shell Core Machine Combustion	C6 - C11	0.02	0.0075	0.03	0.03	0.33	0.39	0.00	negl
Shell Core Machines	C12 - C14	0.54	1.62	0.24	0.24	0.00	0.23	0.14	0.54
Shell Core Machine Combustion	C12 - C14	0.02	0.01	0.02	0.02	0.28	0.33	0.00	negl
Resin/sand Batch Mixer	EU - M1	0.00	59.13	8.87	8.87	0.00	0.00	0.00	0.00
Drying Oven Combustion		0.0120	0.0042	0.0166	0.0166	0.1840	0.22	0.0013	negl
Core Release Spray Operation		0.04	2.37	2.37	2.37	0.00	0.00	0.00	0.00
Shell Core Release		0.03	0.02	0.02	0.02	0.00	0.00	0.00	0.00
Water-based Core Wash		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mold Cleaning Operation		2.20	0.12	0.12	0.12	0.00	0.00	0.00	0.00
Total		64.65	65.71	12.06	12.06	0.79	1.50	0.37	1.36

		Controlled Emissions (tpy)							
Process	Unit ID	VOC	PM	PM10	PM 2.5	со	NOx	SO2	HAP
Cold Box Core Machines	C1 - C5	60.97	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Shell Core Machines	C6 - C11	0.81	2.43	0.36	0.36	0.00	0.34	0.22	0.81
Shell Core Machine Combustion	C6 - C11	0.02	0.0075	0.03	0.03	0.33	0.39	0.00	negl
Shell Core Machines	C12 - C14	0.54	1.62	0.24	0.24	0.00	0.23	0.14	0.54
Shell Core Machine Combustion	C12 - C14	0.0181	0.0062	0.0250	0.0250	0.28	0.33	0.00	negl
Resin/sand Batch Mixer	EU - M1	0.00	0.59	0.09	0.09	0.00	0.00	0.00	0.00
Drying Oven Combustion		0.01	0.0042	0.02	0.02	0.18	0.22	0.00	negl
Core Release Spray Operation		0.04	2.37	2.37	2.37	0.00	0.00	0.00	0.00
Shell Core Release		0.03	0.02	0.02	0.02	0.00	0.00	0.00	0.00
Water-based Core Wash		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Mold Cleaning Operation		2.20	0.12	0.12	0.12	0.00	0.00	0.00	0.00
Total		64.65	7.17	3.28	3.28	0.79	1.50	0.37	1.36

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Appendix A: Emission Calculations VOC Emissions Cold Box Core Machines

Company Name:Core Ventures, Inc.Address City IN Zip:3840 East Pontiac Street, Fort Wayne, IN 46803Permit Number:003-28992-00339Plt ID:003-00339Reviewer:Deborah ColeDate:March 29, 2010

Units	ID	Capacity (tons cores/hr)	VOC Emission Factor from Resin (Ib/ton core)*	Potential VOC Emissions (Ib/hr)	Potential VOC Emissions (ton/year)
Cold Box Core Machine	C1	1.2	1.00	1.20	5.26
Cold Box Core Machine	C2	1.2	1.00	1.20	5.26
Cold Box Core Machine	C3	1.2	1.00	1.20	5.26
Cold Box Core Machine	C4	1.2	1.00	1.20	5.26
Cold Box Core Machine	C5	1.2	1.00	1.20	5.26
Total		6		6.00	26.28

Process	Unit ID	Capacity (tons cores/hr)	VOC Emission Factor from Catalyst (Ib/ton core)*	Potential VOC Emissions (Ib/hr)	Potential VOC Emissions (ton/year)
Cold Box Core Machine	C1	1.2	1.32	1.58	6.94
Cold Box Core Machine	C2	1.2	1.32	1.58	6.94
Cold Box Core Machine	C3	1.2	1.32	1.58	6.94
Cold Box Core Machine	C4	1.2	1.32	1.58	6.94
Cold Box Core Machine	C5	1.2	1.32	1.58	6.94
Total		6		7.92	34.69

VOC from Resin (lbs/hr)	6.00
VOC from Catalyst (lbs/hr)	7.92
TOTAL (lbs/hr)	13.92

VOC from Resin (tpy)	26.28
VOC from Catalyst (tpy)	34.69
TOTAL (tpy)	60.97

* Emission factors were provided by the manufacturer and based on the initial permit for this source, 003-21849-00339, issued on 2/7/2006. Catalyst is Dimethylisopropandamine which is not a HAP; Resin contains no HAP.

Potential Emissions (lbs/hr) = Max capacity (tons core /hr) x Emission Factor (lbs/ton core)

Potential Emissions (tons/year) = Max capacity (tons core /hr) x Emission Factor (lbs/ton core) x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emissions Calculations Shell Core Machines C6 - C11 PM, PM10, PM 2.5, NOx, and SOx

 Company Name:
 Core Ventures, Inc.

 Address City IN Zip:
 3840 East Pontiac Street, Fort Wayne, IN 46803

 Permit Number:
 003-28992-00339

 Pit ID:
 003-00339

 Reviewer:
 Deborah Cole

 Date:
 March 9, 2010

Units	ID	Capacity (tons core/hr)	PM (tpy)	PM10 (tpy	PM 2.5 (tpy)	NOx (tpy)	SOx (tpy)
Emission Factor (lb/ton core)			3.60	0.54	0.54	0.5	0.32
Shell Core Machine	C6	0.1125	0.4050	0.0608	0.0608	0.0563	0.0360
Shell Core Machine	C7	0.1125	0.4050	0.0608	0.0608	0.0563	0.0360
Shell Core Machine	C8	0.1125	0.4050	0.0608	0.0608	0.0563	0.0360
Shell Core Machine	C9	0.1125	0.4050	0.0608	0.0608	0.0563	0.0360
Shell Core Machine	C10	0.1125	0.4050	0.0608	0.0608	0.0563	0.0360
Shell Core Machine	C11	0.1125	0.4050	0.0608	0.0608	0.0563	0.0360
TOTAL			2.4300	0.3645	0.3645	0.3375	0.2160

326 IAC 6-3-2(a) Allowable Rate of Emissions

Unit ID	Process Rate	Process	Allowable PM	Allowable PM
	(materials throughput)	Weight Rate	Emissions	Emissions
	(lbs/hr)	(tons/hr)	(lbs/hr)	(tons/yr)
Shell Core Machines C6-C11	224	0.112	0.95	4.14

Methodology

Allowable Emissions (E)(lb/hr = 4.10 (Process Weight Rate) ^ 0.67

Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr) * 8760) / 2000

Shell Core Machines C12 - C14 PM, PM10, PM 2.5, NOx, and SOx

		Capacity	PM (tpy)	PM10 (tpy	PM 2.5 (tpy)	NOx (tpy)	SOx (tpy)
Units	ID	(tons core/hr)					
Emission Factor (lb/ton core)			3.60	0.54	0.54	0.5	0.32
Shell Core Machine	C12	0.15	0.5400	0.0810	0.0810	0.0750	0.0480
Shell Core Machine	C13	0.15	0.5400	0.0810	0.0810	0.0750	0.0480
Shell Core Machine	C14	0.15	0.5400	0.0810	0.0810	0.0750	0.0480
TOTAL			1.62	0.24	0.24	0.23	0.14

326 140 6-3-2(2)	Allowable Pate of Emissions
320 IAC 0-3-2(a	Allowable Rate of Emissions

Unit ID	Process Rate	Process	Allowable PM	Allowable PM
	(materials throughput)	Weight Rate	Emissions	Emissions
	(lbs/hr)	(tons/hr)	(lbs/hr) per machine	(tons/yr)
Shell Core Machines C12-C14	300	0.150	1.15	5.04

Methodology

Allowable Emissions (E)(lb/hr = 4.10 (Process Weight Rate) ^ 0.67 Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr) * 8760) / 2000

PM / PM10 Emission Factors from FIRE 6.25 SCC 30400350

SOx Emission Factor from FIRE 6.25 SCC 30400370

NOx Emission Factor from FIRE 6.25 SCC 30400370

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Appendix A: Emissions Calculations Shell Core Machines C6 - C11 VOC and HAPs Emissions Page 4 of 11 TSD App A

Company Name: Core Ventures, Inc. Address City IN Zip: 3840 East Pontiac Street, Fort Wayne, IN 46803 Permit Number: 003-28992-00339 Pit ID: 003-00339 Reviewer: Deborah Cole Date: March 9, 2010

Shell Core Machines VOC and HAP Potential to Emit

		Capacity	% Phenol	% hexa	% Phenol converted to	% Hexa	voc	HAP
Unit	ID	(tons core/hr)	(maximum)	(maximum)	formaldehyde and released	converted to ammonia	(tons/year)	(tons/year)
Shell Core Machine	C6	0.1125	5.5%	1.0%	0.25%	50%	0.1355	0.1355
Shell Core Machine	C7	0.1125	5.5%	1.0%	0.25%	50%	0.1355	0.1355
Shell Core Machine	C8	0.1125	5.5%	1.0%	0.25%	50%	0.1355	0.1355
Shell Core Machine	C9	0.1125	5.5%	1.0%	0.25%	50%	0.1355	0.1355
Shell Core Machine	C10	0.1125	5.5%	1.0%	0.25%	50%	0.1355	0.1355
Shell Core Machine	C11	0.1125	5.5%	1.0%	0.25%	50%	0.1355	0.1355
TOTAL							0.8130	0.8130

Appendix A: Emissions Calculations Shell Core Machines C12 - C14 VOC and HAPs Emissions

Unit	ID	Capacity (tons core/hr)	% Phenol (maximum)	% hexa (maximum)	% Phenol converted to formaldehyde and released	% Hexa converted to ammonia	VOC (tons/year)	HAP (tons/year)
Shell Core Machine	C12	0.15	5.5%	1.0%	0.25%	50%	0.1807	0.1807
Shell Core Machine	C13	0.15	5.5%	1.0%	0.25%	50%	0.1807	0.1807
Shell Core Machine	C14	0.15	5.5%	1.0%	0.25%	50%	0.1807	0.1807
TOTAL							0.5420	0.5420

Sand is pre-coated; %Phenol and % hexa are % of total sand throughput and is based on the MSDS from the manufacturer. % released and % converted are based on Form R Reporting of Binder Chemicals Used in Foundries

Appendix A: Emissions Calculations Natural Gas Combustion Only MM BTU/HR <100 Shell Core Machines C6-C11

Company Name: Core Ventures, Inc. Address City IN Zip: 3840 East Pontiac Street, Fort Wayne, IN 46803 Permit Number: 003-28992-00339 Plt ID: 003-00339 Reviewer: Deborah Cole Date: March 9, 2010

Heat Input Capacity MMBtu/hr

0.9

Potential Throughput MMCF/yr

7.9

Shell Core Units C6 - C11 at 150,000 Btu/hr each

	Pollutant								
	PM*	PM10*	SO2	NOx	VOC	CO			
Emission Factor in Ib/MMCF	1.9	7.6	0.6	100.0	5.5	84.0			
				**see below					
Potential Emission in tons/yr	0.01	0.03	0.00	0.39	0.02	0.33			

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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 (SUPPLEMENT D 3/98)

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

See page 3 for HAPs emissions calculations.

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Appendix A: Emissions Calculations Natural Gas Combustion Only MM BTU/HR <100 HAPs Emissions Shell Core Machines C6-C11

Company Name:Core Ventures, Inc.Address City IN Zip:3840 East Pontiac Street, Fort Wayne, IN 46803Permit Number:003-28992-00339Plt ID:003-00339Reviewer:Deborah ColeDate:March 9, 2010

		ł	HAPs - Organics		
	Benzene	Dichlorobenze ne	Formaldehyde	Hexane	Toluene
Emission Factor in Ib/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	0.0000083	0.0000047	0.0002957	0.0070956	0.0000134
			HAPs - Metals		
Emission Factor in Ib/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	0.00000197	0.00000434	0.00000552	0.00000150	0.00000828

Methodology is the same as page 1.

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 Natural Gas Combustion Only MM BTU/HR <100 Shell Core Machines C12-C14

Company Name: Core Ventures, Inc. Address City IN Zip: 3840 East Pontiac Street, Fort Wayne, IN 46803 Permit Number: 003-28992-00339 Plt ID: 003-00339 Reviewer: Deborah Cole Date: March 9, 2010

Heat Input Capacity MMBtu/hr 0.75 Shall Corp Units C12 - C14 et 250 000 Btu/ Potential Throughput MMCF/yr 6.57

Shell Core Units C12 - C14 at 250,000 Btu/hr each

Criteria Pollutant Emissions

	Pollutant								
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO		
Emission Factor in Ib/MMCF	1.9	7.6	5.7	0.6	100.0	5.5	84.0		
					**see below				
Potential Emission in tons/yr	0.0062	0.0250	0.0187	0.0020	0.3285	0.0181	0.2759		

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

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

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Appendix A: Emissions Calculations Natural Gas Combustion Only MM BTU/HR <100 Shell Core Machines C12-C14

Company Name: Core Ventures, Inc. Address City IN Zip: 3840 East Pontiac Street, Fort Wayne, IN 46803 Permit Number: 003-28992-00339 Plt ID: 003-00339 Reviewer: Deborah Cole Date: March 9, 2010

Hazardous Air Pollutant Emissions

	HAPs - Organics								
Emission Factor in Ib/MMcf	Benzene 2.10E-03	Dichlorobenzene 1.20E-03	Formaldehyde 0.08	Hexane 1.80	Toluene 3.40E-03				
Potential Emission in tons/yr	0.00000690	0.00000394	0.00024638	0.00591300	0.00001117				

	HAPs - Metals							
Emission Factor in Ib/MMcf	Lead 5.00E-04	Cadmium 1.10E-03	Chromium 1.40E-03	Manganese 3.80E-04	Nickel 2.10E-03			
Potential Emission in tons/yr	0.0000016	0.0000036	0.0000046	0.0000012	0.0000069			

Methodology

All emission factors are based on normal firing. MMBtu = 1,000,000 Btu MMCF = 1,000,000 Cubic Feet of Gas Total HAPs = 0.006 tons/yr

Worst Single HAP (Hexar 0.006 tons/yr

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu 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 (SUPPLEMENT D 3/98).

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

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Appendix A: Emission Calculations PM Emissions Resin/Sand Batch Mixer

Company Name: Core Ventures, Inc. Address City IN Zip: 3840 East Pontiac Street, Fort Wayne, IN 46803 Permit Number: 003-28992-00339 Plt ID: 003-00339 Reviewer: Deborah Cole Date: March 9, 2010

						Control	Controlled Potential Emissions (Ibs		Controlled Potential Emissions (tons				
Resin/Sand	Capacity	Emiss	ion Factor (lb/ton)*	Uncontrolled Potential Emissions (tons/yr)		Efficiency**	hr)			year)			
Batch Mixer	(lbs/hr)	PM	PM10	PM	PM10	PM 2.5		PM	PM10	PM 2.5	PM	PM10	PM 2.5
EU - M1	7500	3.6	0.54	59.13	8.87	8.87	99%	13.5	2.025	2.025	0.59	0.09	0.09

Note: * Emission factor is from Fire 6.23, SCC 3-04-003-50

** Control device is a dust collected exhausting to the outside.

Potential Emissions (tpy) = Capacity (lbs/hr) x 1 ton/2000 lbs x Emission Factor (lb/ton sand) x 8760 hrs/yr x 1 ton/2000 lbs

326 IAC 6-3-2(a) Allowable Rate of Emissions

Unit ID	Process Rate	Process	Allowable PM	Allowable PM	
	(materials throughput)	Weight Rate	Emissions	Emissions	
	(lbs/hr)	(tons/hr)	(lbs/hr)	(tons/yr)	
Resin/Sand Batch Mixer	7,500	3.750	9.94	43.54	

Methodology

Allowable Emissions (E)(lb/hr = 4.10 (Process Weight Rate) ^ 0.67

Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr) * 8760) / 2000

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Appendix A: Emissions Calculations Natural Gas Combustion Only MMBTU/HR < 100 Drying Oven

Company Name: Core Ventures, Inc. Address City IN Zip: 3840 East Pontiac Street, Fort Wayne, IN 46803 Permit Number: 003-28992-00339 Plt ID: 003-00339 Reviewer: Deborah Cole Date: March 9, 2010

Heat Input Capacity	F
MMBtu/hr	

Potential Throughput MMCF/yr

0.5

4.4

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in Ib/MMCF	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.0042	0.0166	0.0013	0.2190	0.0120	0.1840

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

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

Methodology

All emission factors are based on normal firing.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

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

Appendix A: Emission Calculations VOC and HAP Emissions Core Release and Wash and Mold Cleaning Operations

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Company Name: Core Ventures, Inc. Address City IN Zip: 3840 East Pontiac Street, Fort Wayne, IN 46803 Permit Number: 003-28992-00339 Plt ID: 003-00339 Reviewer: Deborah Cole Date: March 9, 2010

Release Agents

								PTE of				
		Potential Usage	Transfer	Density		wt%		VOC	PTE of VOC	PTE of PM / PM10	PTE of PM /	PTE of HAP
Product Name	Туре	(gal/hr)	Efficiency	(lb/gal)	wt% VOCs	solids	wt% HAPs	(lbs/day)	(tons/year)	(lbs/hr)	PM10 (tons/year)	(tons/year)
Zip Slip 157H	Core Release Agent	0.12	40%	7.63	1%	99%	0%	0.220	0.040	0.541	2.37	0
Silicone Emulsion	Shell Core Release Agent	0.0016	40%	8.17	50%	50%	0%	0.158	0.029	0.004	0.02	0

Mold Cleaner

								PTE of				
		Potential Usage	Transfer	Density		wt%		voc	PTE of VOC	PTE of PM / PM10	PTE of PM /	PTE of HAP
Product Name	Туре	(gal/hr)	Efficiency	(lb/gal)	wt% VOCs	solids	wt% HAPs	(lbs/day)	(tons/year)	(lbs/hr)	PM10 (tons/year)	(tons/year)
Zip-Clean 38	Mold Cleaner	0.07	40%	7.84	92%	8.5%	0%	12.059	2.201	0.028	0.12	0

Water-based Core Wash

					PTE of VOC
Product Name	Potential Usage (gal/yr)	Density (lb/gal)	wt% VOCs	wt% HAPs	(tons/year)
Rheotek	17000	11.52	0.00%	0%	0.000000
Total for Core Wash	17000				0.00000

Calculations Methodology

VOC (tpy) = Usage x Density (lbs/gal) x wt% VOCs

HAP (tpy) = Usage x density x wt% HAPs

PM/PM10 (tpy) = Usage x density (lbs/gal) x wt% solids x (1 - transfer efficiency)

Transfer Efficiency for Mold Cleaner and Core Release Agents from AP-42, Table 4.2.2.11-1 for air atomized spray applications.

Core Release and Mold Cleaner Daily Usage								
Product Name Gals/hour Daily Usag								
Zip Slip 157H	0.12	2.88						
Zip-Clean 38	0.07	1.68						
Silicone Emulsion	0.0016	0.04						

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Mitchell E. Daniels Jr. Governor

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Thomas W. Easterly Commissioner 100 North Senate Avenue Indianapolis, Indiana 46204 (317) 232-8603 Toll Free (800) 451-6027 www.idem.IN.gov

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

- TO: Michael Roselle Core Ventures, Inc. 6000 Old Maumee Road Fort Wayne, IN 46803
- DATE: July 29, 2010
- FROM: Matt Stuckey, Branch Chief Permits Branch Office of Air Quality
- SUBJECT: Final Decision Minor Source Operating Permit Renewal 003-28992-00339

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because 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.

A copy of the final decision and supporting materials has also been sent via standard mail to: Amanda Hennessy – Keramida Environmental, Inc. OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.



Mitchell E. Daniels Jr. Governor

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Thomas W. Easterly Commissioner 100 North Senate Avenue Indianapolis, Indiana 46204 (317) 232-8603 Toll Free (800) 451-6027 www.idem.IN.gov

July 29, 2010

TO: Allen County Library – Pontiac Branch

From: Matthew Stuckey, Branch Chief Permits Branch Office of Air Quality

Subject: Important Information for Display Regarding a Final Determination

Applicant Name:Core Ventures, Inc.Permit Number:003-28992-00339

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, we ask that you retain this document for at least 60 days.

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or 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.

Enclosures Final Library.dot 11/30/07



Mail Code 61-53

IDEM Staff	GHOTOPP 7/29	/2010		
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1		Michael Roselle Core Ventures, Inc 6000 Old Maumee Rd Ft Wayne IN 46803 (Source	e CAATS) via	a confirmed de	livery						Remarks
2		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)									
3		Duane & Deborah Clark Clark Farms 6973 E. 500 S. Columbia City IN 46725 (Affected Party)									
4		Mr. Victor Locke WPTA-TV P.O.Box 2121 Fort Wayne IN 46801 (Affected Party)									
5		Fort Wayne City Council and Mayors Office One Main Street Fort Wayne IN 46802 (Local Official)									
6		Mr. John E. Hampton Plumbers & Steamfitters, Local 166 2930 W Ludwig Rd Fort Wayne IN 46818-1328 (Affected Party)									
7		Allen Co. Board of Commissioners One Main St. Fort Wayne IN 46802 (Local Official)									
8		Fort Wayne-Allen County Health Department 1 E Main Street, 5th Floor Fort Wayne IN 46802-1810 (Health Department)									
9		Ms. Amanda Hennessy Keramida Environmental, Inc. 401 N College Ave Indianapolis I	N 46202 (C	Consultant)							
10		Allen County Library - Pontiac Branch 2215 S. Hanna Street Fort Wayne IN 46803 (Library)								
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