

**ProEdge, Inc.**

23326 Shelby Road

PO Box 201, Shelby, IN 46377

Phone: 219-552-9550 Fax: 219-552-9596

April 10<sup>th</sup>, 2024

Indiana Department of Environmental Management

Office of Air Quality

Compliance Branch

Mail Code/61-53 IGCN 1003

100 North Senate Avenue

Indianapolis, Indiana 46204-2251

IDEM

Office of External Affairs

Northwest Regional Office

330 W. US Highway 30, Suite F

Valparaiso, IN 46385-5392

Received State of Indiana

APR 17 2024

4/11

Department of Environmental Management  
OFFICE OF AIR QUALITY

Re: Annual Compliance Certifications  
089-42415-00447

To whomever it concerns,

Enclosed is our Annual Compliance Certification for 2023.

Sincerely,



Vinay Turke

Environmental Compliance Manager

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

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

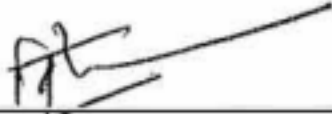
Source Name: ProEdge, Inc.  
Source Address: 23326 Shelby Road, Shelby, Indiana 46377  
Mailing Address: P.O. Box 201, Shelby, IN 46377  
FESOP Permit No.: F089-42415-00447

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

Please check what document is being certified:

- ☒ Annual Compliance Certification Letter
- ☐ Test Result (specify) \_\_\_\_\_
- ☐ Report (specify) \_\_\_\_\_
- ☐ Notification (specify) \_\_\_\_\_
- ☐ Affidavit (specify) \_\_\_\_\_
- ☐ Other (specify) \_\_\_\_\_

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

Signature: 

Printed Name: Vinay Turke

Title/Position: Environmental Compliance Manager

Date: 04/10/2024

**PART 70 / FESOP PERMIT- ANNUAL COMPLIANCE CERTIFICATION**

This form can be used to satisfy the annual compliance certification requirements for Part 70 sources under 326 | AC 2-7-5326 | AC 2-7-6(5)(C) and FESOP sources under 326 | AC 2-B-5(a)(1)(C).

SOURCE INFORMATION				
(1) Source name:	ProEdge, Inc.			
(2) Source address:	23326 Shelby Rd.			
(3) City:	Shelby	(4) State:	IN	(5) Zip code: 46377
(6) Mailing address: (if different from above)	PO Box 201			
(7) Mailing City:	Shelby	(8) Mailing State:	IN	(9) Mailing Zip code: 46377
(10) Permit numbers:	FESOP 0B9-42415-00447	(11) Reporting Period:	01/01/2023 – 12/31/2023	
(12) Contact person:	Viggy Turke	(13) Email Address:	<a href="mailto:vturke@proedgefilms.com">vturke@proedgefilms.com</a>	
(14) Phone number:	219-552-9550	(15) Fax number:	219-552-9596	
(16) Comments:				

**SOURCE COMPLIANCE INFORMATION**

(17) CHECK THE BOX NEXT TO EITHER (A) OR (B) BELOW. (The terms "continuous compliance" and "intermittent compliance" are defined on the Definitions page).

(A) This source was in <b>CONTINUOUS COMPLIANCE</b> with <b>all of the permit terms and conditions</b> that impose a work practice or emission standard or requires performance testing, monitoring, record keeping or reporting based on the monitoring methods in the permit.	
(B) This source was in <b>CONTINUOUS COMPLIANCE</b> with <b>all of the permit terms and conditions</b> that impose a work practice or emission standard or requires performance testing, monitoring, record keeping or reporting based on the monitoring methods in the permit, <b>except</b> for the terms and conditions listed in the following table for which the source reported intermittent compliance.	XXX

**IMPORTANT:** If you select option (B), you must complete the following table in which you list any permit terms for which compliance was intermittent during the permit for the reporting period covered by this Compliance Certification.

(18) PERMIT TERMS FOR WHICH COMPLIANCE WAS INTERMITTENT

Source Name: ProEdge, Inc.		Source Permit Number: F089-42415-00447	
Permit Term/Condition	Description of Permit Condition	*Method Codes	RepoE Date/Comments
D.1.12	RecprdKeepinqRequirements	WP/RK/RR	From apprximately 7:00 a.m. until 3:00 p.m. on January 16 <sup>th</sup> , 2023 we did not recprd these temperatures because, unbek apwostp the operatpr, the chart recprding paper was jammed. This issue was later discovered during a peripdic check and the chart recprding paper was immediately unjammed. IDEM was notified within 30 days and deviatipo was repprt edo quarterly repprt.


\*Method Codes:

Monitoring methods: CEMS = continuous emissions monitoring system; COMS = continuous opacity monitoring system; ST = stack test;

VE = visible emissions; RK = record keeping; RR = review of records; MB = mass balance; EF = emissions factor; Insp = inspections; FA = fuel analysis; WP = work practice; PM = parametric monitoring; Calc = calculations; O = other (specify in Comments)

**For Part 70 sources** The submittal by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**For FESOP sources:** The certification which shall be submitted by the Permittee requires the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.			
Signature:		Title/Position:	Environmental Compliance Manager
Printed Name:	Vinay Turke	Date:	04/10/2024
Phone number:	219-552-9550	Email Address:	vturke@proedgemlms.com

PLEASE NOTE: YOU MUST EITHER SIGN THIS FORM OR ATTACH THE CERTIFICATION FORM INCLUDED IN YOUR PERMIT.

## COMPLIANCE CERTIFICATION

Permit term/condition		Comp. status CC/ IC	Methods	Report date / Comments
SECTION B - GENERAL CONDITIONS (copy as needed)				
B.1	Permit Description	CC	RK/RR	Permit has been in place since 2001. Renewal issued on 04/26/2017 through 04/26/2027. All definitions are agreed.
B.2	Permit Fee	CC	RK/RR	Permit has been in place since 2001. Renewal issued on 04/26/2017 and expires on 04/26/2027.
B.8	Certification	CC		Attach FESOP certification page to report.
B.9	Annual Compliance Certification	CC	RK/RR	2022 Annual Compliance report submitted on 04/07/2023. IDEM revised report format in 2009 to only require reporting of items not in compliance. Will submit 2023 report prior to April 15 <sup>th</sup> , 2024
B.11	Preventive Maintenance Plan	CC	RK/RR	A copy of the source's Preventive Maintenance submitted as part of ACC 2002 (OP-CT-01 and Oxidizer/Press Maintenance Log) This plan is active.
B.12	Emergency Provisions	CC		The source did not experience or operate under an Emergency Provision as defined in this section in 2016.
B.15	Permit Modification/Reopening/Revocation/Reissuance/ Termination	CC	RK/RR	No Permit Modification/Reopening, Revocation, Reissuance, Termination, Amendment or Revision has occurred as defined in this section.
B.16	Permit Renewal	CC	RK/RR	Permit renewal issued on 04/26/2017 through 04/26/2027.
B.17	Permit Amendment/Revision	CC	RK/RR	No Permit Modification/Reopening, Revocation, Reissuance, Termination, Amendment or Revision has occurred as defined in this section.
B.18	Operational Flexibility	CC	RK/RR	No changes have occurred at the source. No emissions have been traded.
B.19	Source Modification Requirement	CC	RK/RR	No modifications have occurred
B.21	Transfer of Ownership of Operational Control	CC	RK/RR	Change in ownership of operational control occurred effective from Oct. 2021.
B.22	Annual Fee Payment	CC	RK/RR	Annual fee paid 03/28/24 on Ch#13585 (On installation plan)

CC = continuous compliance; IC = intermittent compliance Monitoring methods; CEMS = continuous emissions monitoring system; COMS = continuous opacity monitoring system; ST = stack test; VE = visible emissions; RK = record keeping; RR = review of records; MB = mass balance; EF = emissions factor; Insp = inspections; FA = fuel analysis; WP = work practice; PM = parametric monitoring; Cal = calculations; O = other (specify in Comments)

Permit term/condition		Comp. status CC / IC	Methods	Repo date / Comments
<b>SECTION C - SOURCE OPERATION CONDITIONS</b> (copy as needed)				
C.1	Particulate Emissions Limitations	CC	RK	Within Limits set in Section D, reported on Quarterly Reports
C.2	Overall Source Limit	CC	RR	Within limits set in section D, reported on Quarterly reports
C.3	Opacity	CC	VE	No visible emissions during 2023.
C.4	Open Burning	CC	N/A	No open burning occurred at this facility as defined in this section.
C.5	Incineration	CC	N/A	No incineration occurred as defined in this section.
C.6	fugitive Dust Emissions	CC	N/A	No fugitive dust was created at this facility as defined in this section.
C.7	Asbestos Abatement Projects	CC	N/A	No asbestos removal occurred as defined in this section.
C.8	Performance Testing	CC	ST/RR	Stack test was conducted on 10/25/2022 and reports submitted to /DEM on 11/10/2022. Next Stack test will be due in April 2025
C.9	Compliance Requirements	CC	ST/RK	All quarterly report submitted in 2023.
C.10	Compliance Monitoring	CC	CEMS	Control devices and monitoring equipment are in place and functioning properly.
C.11	Instrument Specifications	CC	RK/RR	We replaced our chart recorder with an updated version on 3/11/2013. Recorder was calibrated on 04/04/24 and is in spec.
C.12	Risk Management Plans	CC	N/A	We do not meet any substance threshold quantity as defined in this section.
C.13	Excursions or Exceedances	CC	RK/RR	No deviations occurred in year 2023.
C.14	Actions Related to Non-Compliance Demonstrated by a Stack Test	CC	ST/RR	Stack test was conducted on 10/25/2022 and submitted to /DEM on 11/10/2022. Next Stack test will be due in April 2025
C.15	Emission Statement	CC	RK/RR	TR/ Emission Statement will be electronically submitted before July 1st 2024
C.16	General Record Keeping Requirement §326/AC 2-8-4(3) I 326 IAC 2-8-51	CC	RK/RR	Reports are on file in Environmental Mgr. office. Production records are filed in job jackets stored by month.
C.17	General Reporting Requirement §326 IAC 2-8-4(3)(c) [326 IAC 2-1.1-1/	CC	RK/RR	All required reports were submitted on time for 2023.

CC = continuous compliance; IC = intermittent compliance Monitoring methods; CEMS = continuous emissions monitoring system; COMS = continuous opacity monitoring system; ST = stack test; VE = visible emissions; RK = record keeping; RR = review of records; MB = mass balance; EF = emissions factor; hsp = inspections; FA = fuel analysis; WP = work practice; PM = parametric monitoring; Cal = calculations; O = other (specify in Comments)

C.18	Compliance with 40CFR 82 and 326 IAC 22-1	CC	WP	Use certified maintenance.

Permit term/condition		Comp. status CC / IC	Methods	Report date / Comments
<b>SECTION D - FACILITY OPERATION CONDITIONS</b> (copy as needed)				
D.1.1	FESOP; Volatile Organic Compounds	CC	RK	Quarterly Reports filed confirming compliance as defined in this section for 2023.
D.1.2	FESOP; Hazardous Air Pollutants	CC	R/K	Quarterly Reports filed confirming compliance as defined in this section for 2023.
D.1.3	Crabapple Arts Operation	CC	RK/ST	All specifications met as defined in this section. Stack test was conducted on 10/25/2022 confirming compliance.
D.1.4	Preventive Maintenance Plan	CC	RK/WP	Copy of Plan submitted January 6, 2003(OP-CT-01) Press/Oxidizer Maintenance Log. This plan and log are active.
D.1.5	Testing Requirements	CC	ST/RR	Stack test was conducted on 10/25/2022 and report is submitted to /DEM on 11/10/2022.
D.1.6	Volatile Organic Compounds	CC	ST/RK	2022 Stack testing as well as chart recorder and press wet information confirming compliance as defined in this section.
D.1.7	Volatile Organic Compounds	CC	RK/RR	Information as defined in this section is obtained on manufacturers SDS and recorded in our Quarterly reporting spreadsheet.
D.1.8	Volatile Organic Compounds and HAP Control	CC	WP/RR	Operators monitor control devices and quarterly reports confirm compliance as defined within this section.
D.1.9	Monitoring Requirements	CC	WP/RK	We replaced our chart recorder with an updated version on 3/1/2013. Recorder was calibrated on 04/04/24 and is in sync.
D.1.10	Catalyst Replacement Inspections	CC	NSP/RK/RR	Visual inspection was conducted in October 2023. The inspection revealed no visible signs of catalyst degradation or fouling.
D.1.11	Record Keeping Requirements	CC	WP/RK/RR	All reports and records are on file and accessible as defined in this section. (ST, Quart. crly. catalyst VOC table, SDS, chart readings, press w cts)

CC= continuous compliance; IC= intermittent compliance Monitoring methods; CEMS= continuous emissions monitoring system; COMS= continuous opacity monitoring system; ST= stack test; VE= visible emissions; RK= record keeping; RR= review of records; MB= mass balance; EF= emissions factor; Insp= inspections; FA= fuel analysis; WP= work practice; PM= parametric monitoring; Calc= calculations; O= other (specify in Comments)

				From approximately 7:00 a.m. until 3:00 p.m. on January 16 <sup>th</sup> 2023 we did not record these temperatures because, unbeknownst to the operator, the chart recording paper was jammed. This issue was later discovered during a periodic check and the chart recording paper was immediately unjammed. IDEM was notified within 30 days and deviation was reported in quarterly report.
D.1.12	Record Keeping Requirements	IC	WP/RK/RR	
D.1.14	Reporting Requirements	CC	WP/RK/RR	All required reports were submitted on time in 2023.
Permit term/condition		Comp. status CC/IC	Methods	Report date / Comments
SECTION ONE - NESHAP (copy as needed)				
E.1.1	General Provisions relative to NESHAP	CC	RK/RR	Quarterly Reports are within limits as defined in this section.
E.1.2	NESHAP Subpart KK Requirements	CC	RK/RR	Quarterly Reports are within limits as defined in this section.
E.1.3	Reporting Requirements	CC	WP/RK/RR	Stack test was conducted on 10/25/2022 and report is submitted to IDEM on 11/10/2022. Next Stack test will be due in April 2025.

CC = continuous compliance; IC = intermittent compliance    Monitoring methods: CEMS = continuous emissions monitoring system; COMS = continuous opacity monitoring system; ST = stack test; VE = visible emissions; RK = record keeping; RR = review of records; MB = mass balance; EF = emissions factor; Insp = inspections; FA = fuel analysis; WP = work practice; PM = parametric monitoring; Calc = calculations; O = other (specify in Comments)

ProEdge Inc.  
PO Box 201  
1326Shelby Road,  
Shelby IN-46377

**CERTIFIED MAIL**



7015 0640 0006 3448 0615

RETURN RECEIPT  
REQUESTED

FIRST CLASS



US POSTAGE WILLIAMS BOWES

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APR 11 2024

Indiana Department of Environmental Management  
Office of Air Quality  
Air Compliance/MC61-53 IGCN 1003  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

RETURN RECEIPT  
REQUESTED

## Title V / FESOP Annual Compliance Certification Review Sheet

To: IDEM Virtual File Cabinet	Through: Supervisor	MAA	ACES ID:	296524
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Source Information			
Source Name:	ProEdge, Inc	Plant ID:	089-00447
Permit Number(s):	089-42415-00447	County:	Lake
Certification Year:	2023	Date ACC postmarked:	4/11/2024
Reviewer:	Yukawa, Clifford	Date compliance review started:	6/6/2024

Compliance Review		
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Was the ACC submitted late?
		If submitted late, what action will be taken? <input type="checkbox"/> Violation Letter <input type="checkbox"/> Enforcement Action Letter <input type="checkbox"/> Other:
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Did the source identify any deviations in the ACC?
		If yes, has OAQ already addressed the identified deviations? If so, what actions were taken, including the date the action was taken (e.g., VL; EAL, other)? <b>VL, ACES # 298085, June 6, 2024, failure to record temperature readings for one shift (1/16/2023, 7 am to 3 pm).</b>
		If no action was previously taken by OAQ, what action will be taken to follow-up (e.g., VL; EAL, other)?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you identify any violations not reported in the ACC?
		If yes, describe the violation(s):
		What action has been/will be taken to address the violation(s) (e.g., VL; EAL, other)?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Was a revised ACC required to be submitted?
		Date(s) the source submitted the revised ACC:
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did the source identify any emergencies in the ACC?
		If yes, does the reported emergency qualify as an emergency under 326 IAC 2-7-1(12)? <input type="checkbox"/> Yes <input type="checkbox"/> No
		If the reported emergency does not qualify as an emergency under 326 IAC 2-7-1(12), or relevant federal regulation, what action has been/will be taken?
6/6/2024		Date compliance review completed
		Additional comments: <b>None</b>