

**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

Received State of Indiana

APR 17 2024

A/11

Department of Environmental Management  
OFFICE OF AIR QUALITY

IDEM  
Office of External Affairs  
Northwest Regional Office  
330 W. US Highway 30, Suite F  
Valparaiso, IN 46385-5392

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**

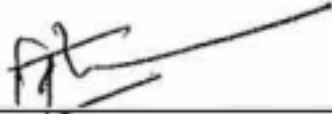
Source Name: ProEdge, Inc.  
Source Address: 23326 Shelby Road, Shelby, Indiana 46377  
Mailing Address: P.O. Box 201, Shelby, IN 46377  
FESOP Permit No.: F089-42415-00447

**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 IAC 2-7-5, 326 IAC 2-7-6(5)(C) and FESOP sources under 326 IAC 2-8-5(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 089-42415-00447	(11) Reporting Period:	01/01/2023 – 12/31/2023	
(12) Contact person:	Vinay 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	Report Date/Comments
D.1.12	Record Keeping Requirements	WP/RK/RR	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.

**\*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 notification 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@proedgefilms.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 Definitions	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 Term	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	RK	<del>Attach FESOP certification page to report.</del>
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-D-1 and Oxidizer/Press Maintenance Log) This plan is active.
B.12	Emergency Provisions	CC	RK	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 or 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 or 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 CTA13585 (On installment 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; Calc = calculations; O = other (specify in Comments)

Permit term/condition		Comp. status CC/IC	Methods	Report date / Comments
SECTION C - SOURCE OPERATION CONDITIONS				
C.1	Particulate Emissions Limitations	CC	I	UE U / (N/A) D )- -A)
C.2	IdC GN	CC		g P / )EJA/ )DE -A) - TCdE)TR I
C.3	CD	CC		No visible emissions during 2023.
C.4	DA	CC	N/A	n- -)A EA - DD USES C/C) PA section.
C.5	Incineration	CC	N/A	No incineration occurred as defined in this section.
C.6	Fugitive Dust Emissions	CC	N/A	n- N CT/NC/D CdE DU C/C) PA section.
C.7	e / E) / E- dECE)	CC	N/A	n- C   - DD C/C) g /IDE-A
C.8	Performance Testing	CC	O	ONCDE) / NC / D-AC -A 0/25/2022 C I- / E d- -A 0/2022.n) OCD d) / 8PRE) CT) UAe lel
C.9		CC	O	eR T ) / le
C.10	Compliance Monitoring	CC	O	Control devices and monitoring equipment are in place and ADd
C.11	Instrument Specifications	CC		We replaced our chart recorder with an updated version on le )D-C) eC / DCR Ed -A04/04/24 C / A spec.
C.12	D/ RCA /	CC	N/A	) C-A-E))E C / ) / C) in this section.
C.13	Excursions or Exceedances	CC		n- C) - DD TdA )C lel
C.14	eDEP-A)C)C d-n-A ) E CO )/d	CC	O	ONCDE) e DACTD)C -A 10/25/2022 CAC/TE - -A lell CD N) / E El CT) A eTR lel
C.15	Emission Statement	CC	I	OECS) e E) ) / E) T lel
C.16		CC	II	)- d) -A) A - -CTDE d)D-C / CT))C -E CD / E-d)CE AS
C.17		CC	I	eR )d)C )- /e) / -A E lel

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C.18		CC	WP	

Permit term/condition		Comp. status CC / IC	Methods	Report date / Comments
<b>SECTION D FACILITY OPERATION CONDITIONS</b>				
	1C. C	CC	RK	8.1 1 8
	1	CC	R/K	8.1 1 1
	C 8 C	CC	RK/ST	8 81 1 1
	C	CC		1 1 C 1 8 C Cl. E.
8		CC		
1	C 1	CC		C 8 C C 1. 8
1	C 1	CC		1 1 8 8 1C. 1
1	118 C 11	CC		1 11 1 1 8 8.1 8C8 1
1		CC		
C	C	CC		
.1		CC		1 1 1 C 88 C8 8 8.88 .8 C C .C8

D.1.12	Record Keeping Requirements	IC	WP/RK/RR	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.1.14	Reporting Requirements	CC	WP/RK/RR	All required reports were submitted on time for 2023.
<b>Permit term/condition</b>		<b>Comp. status CC / IC</b>	<b>Methods</b>	<b>Report date / Comments</b>
<b>SECTION E - NESHAP (copy as needed)</b>				
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 reports 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  
1326 Shelby Road,  
Shelby IN-46377

**CERTIFIED MAIL**



7015 0640 0006 3448 0615

**RETURN RECEIPT  
REQUESTED**

FIRST CLASS



US POSTAGE IMPITNEY BOWES

ZIP 46377 \$ 009.92<sup>0</sup>  
02 7H  
0006157344 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?
<b>6/6/2024</b>		Date compliance review completed
		Additional comments: <b>None</b>