

Mr. Jerry Eagon
Flexible Foam Products, Inc.
1900 West Lusher Avenue
Elkhart, Indiana 46515

Re: 039-10303
First Administrative Amendment to
Part 70 039-6058-00055

Dear Mr. Jerry Eagon:

Flexible Foam Products, Inc. was issued a Title V permit (T039-6058-00055) on September 24, 1998 for operating a stationary soft foam polyurethane block manufacturing plant. A letter requesting changes in the several conditions of the permit was received on November 5, 1998. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

The name of the responsible official has changed. The section A.1 of the permit shall read (changes in bold):

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary soft foam polyurethane block manufacturing plant.

Responsible Official: ~~Loren Dahlberg~~ **Jerry Eagon**

An incorrect capacity was supplied in the application. The capacity changes from 0.37 tons per hour to 1.8 tons per hour. The section A.2 of the permit shall read(changes in bold):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (1) One (1) continuous conveyor polyurethane foam line, identified as EU01, which produces foam blocks approximately three (3) feet thick and ten (10) feet wide, using methylene chloride as a blowing agent, with a maximum capacity of ~~0.37~~ **1.80** tons per hour, and 2,4-toluene diisocyanate (TDI), with a maximum capacity of 4.5 tons per hour, exhausting to six (6) stacks, identified as S-1, S-2, S-3, S-4, S-5, and S-6, respectively.

The new section D.1 of the permit shall read(changes in bold):

One (1) continuous conveyor polyurethane foam line, identified as EU01, which

produces foam blocks approximately three (3) feet thick and ten (10) feet wide, using methylene chloride as a blowing agent, with a maximum capacity of ~~0.37~~ **1.80** tons per hour, and 2,4-toluene diisocyanate (TDI), with a maximum capacity of 4.5 tons per hour, exhausting to six (6) stacks, identified as S-1, S-2, S-3, S-4, S-5, and S6, respectively. This continuous conveyor polyurethane foam line was constructed in May 1977.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment with the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3.5. If you have any questions on this matter, please contact Shantanu Pahi, at (800) 451-6027, press 0 and ask for Shantanu Pahi or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Spahi

enclosed: Amended Title V pages (2 pages)

cc: File - Elkhart County
Elkhart County Health Department
IDEM- Northern Regional Office
Air Compliance Section Inspector - Doug Elliott
Compliance Data Section - Jerri Curless
Permit Tracking - Janet Mobley
Air Programs Section - Nancy Landau

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Flexible Foam Products, Inc.
1900 West Lusher Avenue
Elkhart, Indiana 46515**

(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 in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-6058-00055	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: September 24, 1998
First Administrative Amendment: AA 039-10303	Pages Affected: 4 and 23
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary soft foam polyurethane block manufacturing plant.

Responsible Official: Jerry Eagon
Source Address: 1900 West Lusher Avenue, Elkhart, Indiana 46515
Mailing Address: 1900 West Lusher Avenue, Elkhart, Indiana 46515
SIC Code: 3086
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (1) One (1) continuous conveyor polyurethane foam line, identified as EU01, which produces foam blocks approximately three (3) feet thick and ten (10) feet wide, using methylene chloride as a blowing agent, with a maximum capacity of 1.80 tons per hour, and 2,4-toluene diisocyanate (TDI), with a maximum capacity of 4.5 tons per hour, exhausting to six (6) stacks, identified as S-1, S-2, S-3, S-4, S-5, and S-6, respectively.

This continuous conveyor polyurethane foam line was constructed in May 1977.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

One (1) continuous conveyor polyurethane foam line, identified as EU01, which produces foam blocks approximately three (3) feet thick and ten (10) feet wide, using methylene chloride as a blowing agent, with a maximum capacity of 1.80 tons per hour, and 2,4-toluene diisocyanate (TDI), with a maximum capacity of 4.5 tons per hour, exhausting to six (6) stacks, identified as S-1, S-2, S-3, S-4, S-5, and S-6, respectively. This continuous conveyor polyurethane foam line was constructed in May 1977.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

Any change or modification which may increase the potential emissions to twenty-five (25) tons per year or more of VOC's must be approved by the Office of Air Management before such change may occur.

Compliance Determination Requirements

D.1.2 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.3 Record Keeping Requirements

(a) The Permittee shall maintain monthly records in accordance with (1) through (6) below and by using the following equation:

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

- (1) The HAP's (Methylene Chloride) amount and content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted HAP's (Methylene Chloride) content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total HAP's (Methylene Chloride) usage for each month; and
 - (6) The weight of HAP's (Methylene Chloride) emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.