

Mr. Phillip G. Conarroe
Plant Environmental Specialist
Johns Manville Corporation
P.O. Box 428
Richmond, Indiana 47375

Re: **177-11607**
Review Request
Construction Permit No. 177-5873-00006

Dear Mr. Conarroe:

On November 29, 1999, Johns Manville Corporation submitted a letter to IDEM, Office of Air Management (OAM), requesting an amendment to Construction Permit 177-5873-00006 to change the pressure drop ranges on the processing and housekeeping baghouses due to the installation of new bags. Upon review the OAM has determined that an amendment to Construction Permit 177-5873-00006 is not necessary. The OAM prefers not to indicate a pressure drop range in a permit condition below 1.0 inches of water. A pressure drop range below 1.0 inches of water can not only be an indication of newly installed bags, but can also be an indication of a broken bag or other operational problems.

The OAM believes that a significantly lower pressure drop range due to new bags should be included as part of the Preventive Maintenance Plan. Pursuant to Construction Permit 177-5873-00006, Condition D.4.5 and D.5.2 states, "If the water pressure falls outside of the determined range, corrective action shall be taken in accordance with the Permittee's Preventive Maintenance Plan." Language that could be added to the Preventive Maintenance Plan may include: *The pressure drop across the recently installed bag(s) is considerably lower than one inch of water. Corrective action should be pursued if it takes more than [an approximate amount of operating time] to reach the normal pressure drop range of 1.0 - 7.0 inches of water.*

The source needs to approximate the period of time that it takes newly installed bags to reach the 1.0 - 7.0 inches of water pressure drop range based on the normal operation of the packaging and housekeeping processes and to indicate that period of time in the Preventive Maintenance Plan. It is OAM's experience that newly installed bags after proper installation will operate at their manufacturer's specifications.

If you have any questions on this matter call (800) 451-6027, press 0 and ask for Autumn Marker or extension (3-0242), or dial (317) 233-0242.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

AMM

cc: File - Wayne County
Air Compliance Section Inspector - Warren Greiling
Administrative and Development - Janet Mobley