INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

October 13, 2004

TO: Interested Parties / Applicant

RE: Foamex, LP / 033-17552-00047

FROM: Paul Dubenetzky
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, 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 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).
For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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
FNTVOP.dot 9/16/03

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(800) 451-6027
www.in.gov/idem

PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

Foamex, L.P.
2211 South Wayne Street
Auburn, Indiana 46706

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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 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.: T033-17552-00047	
Issued by: Original Signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: October 13, 2004 Expiration Date: October 13, 2009

TABLE OF CONTENTS

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 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)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary Flexible Polyurethane Foam Production plant.

Responsible Official:	Plant Manager
Source Address:	2211 South Wayne Street, Auburn, Indiana 46706
Mailing Address:	2211 South Wayne Street, Auburn, Indiana 46706
General Source Phone Number:	(260) 925-1073
SIC Code:	3086
County Location:	DeKalb
Source Location 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:

(a) Four (4) Rebond mold units, identified as EU-R1, EU-R2, EU-R3, and EU-R4, with EU-R1 and EU-R2 constructed in 1980 and EU-R3 and EU-R4 constructed in 1995, with a total maximum capacity of bonding 9.6 tons per hour of scrap foam, exhausted through four (4) stacks (S/V ID 28, 29, 35, 36), respectively;

(b) One (1) source-wide adhesive application operation, with emissions venting inside the plant;

(c) One (1) source-wide chemical cleaning solvent usage operation, with emissions venting inside the plant;

(d) one (1) Variable Pressure Foaming (VPF) line, constructed in 2001, with a maximum capacity of producing 800,000,000 board feet of foam per year, with a carbon adsorber to control VOC emissions, exhausted through two (2) stacks (ID Nos. 39 and 40). Alternately, this line also has the capacity to produce a small amount of foam by pouring and using a maximum of 4,000,000 pounds per year of MDI and 447,329 pounds per year of methylene chloride; and

(e) three (3) natural gas-fired industrial boilers identified as Boilers #1, #2 and #3 (EU-B1, EU-B2, EU-B3), each rated at 10.5 million (MM) British thermal units (Btu) per hour and exhausted through three (3) stacks (S/V ID 31,32,33), respectively. Boilers #1 and #2 were installed in 1978 and Boiler #3 was installed in 1986.

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 also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (one (1) 100% petroleum distillate Safety-Kleen parts washer, installed in 2002, with a remote solvent reservoir). [326 IAC 8-3-2]

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]

(c) The following units emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:

(1) TDI/MDI Storage Tanks [40 CFR 63, Subpart III].

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 B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) 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.

B.3 Enforceability [326 IAC 2-7-7]

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.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(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 nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

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 [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(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. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). 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 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report 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) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) 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.

(b) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) 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 or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and the IDEM Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
Northern Regional Office Telephone Number: 574-245-4870
Northern Regional Office Facsimile Number: 574-245-4877

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

(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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) 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.

(2) If IDEM, OAQ, upon receiving a timely and complete 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
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 2-7 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 in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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 Part 70 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 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 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 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.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) 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.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) 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. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

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:

(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.3 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.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 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.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.

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
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, 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 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within thirty (30) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within thirty (30) days, the Permittee may extend the compliance schedule related to the equipment for an additional thirty (30) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial thirty (30) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (± 2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (± 2%) of full scale reading.

(c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.

(d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on February 1, 1999.

(b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(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 take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) 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.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emission of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

(b) The emission statement 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.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(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, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) 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.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Four (4) Rebond mold units, identified as EU-R1, EU-R2, EU-R3, and EU-R4, with EU-R1 and EU-R2 constructed in 1980 and EU-R3 and EU-R4 constructed in 1995, with a total maximum capacity of bonding 9.6 tons per hour of scrap foam, exhausted through four (4) stacks (S/V ID 28, 29, 35, 36), respectively;

(b) One (1) source-wide adhesive application operation, with emissions venting inside the plant;

(c) One (1) source-wide chemical cleaning solvent usage operation, with emissions venting inside the plant;

(d) one (1) Variable Pressure Foaming (VPF) line, constructed in 2001, with a maximum capacity of producing 800,000,000 board feet of foam per year, with a carbon adsorber to control VOC emissions, exhausted through two (2) stacks (ID Nos. 39 and 40). Alternately, this line also has the capacity to produce a small amount of foam by pouring and using a maximum of 4,000,000 pounds per year of MDI and 447,329 pounds per year of methylene chloride.

Insignificant Activity

(a) The following units emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:

(1) TDI/MDI Storage Tanks [40 CFR 63, Subpart III].

(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 2-7-5(1)]

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the four (4) Rebond mold units (EU-R1, EU-R2, EU-R3, and EU-R4), the Variable Pressure Foaming Line (VPF), and the TDI/MDI storage tanks described in this section except when otherwise specified in 40 CFR Part 63, Subpart III.

D.1.2 Flexible Polyurethane Foam Production NESHAP Compliance Dates [326 IAC 2-7-5] [40 CFR Part 63.1291, Subpart III] [326 IAC 20-22-1]

(a) The foam manufacturing process at this source is a slabstock polyurethane foam manufacturing operation.

(b) Pursuant to 40 CFR 63.1291(a), the VPF line, the four (4) Rebond mold units, and the TDI/MDI storage tanks were required to be in compliance with all provisions of this rule no later than October 8, 2001.

D.1.3 Flexible Polyurethane Foam Production NESHAP [326 IAC 2-7-5] [40 CFR Part 63.1294, Subpart III][326 IAC 20-22-1]

Pursuant to 40 CFR 63.1294, the Permittee shall comply with the provisions of the section which are as follows:

(a) Diisocyanate storage vessels.
Diisocyanate storage vessels shall be equipped with either a system meeting the requirements in paragraph (a)(1) below, or a carbon adsorption system meeting the requirements of paragraph (a)(2) below.

(1) The storage vessel shall be equipped with a vapor return line from the storage vessel to the tank truck or rail car that is connected during unloading.
  (i) During each unloading event, the vapor return line shall be inspected for leaks by visual, audible, or any other detection method.
  (ii) When a leak is detected, it shall be repaired as soon as practicable, but not later than the subsequent unloading event.
(2) The storage vessel shall be equipped with a carbon adsorption system, meeting the monitoring requirements of 40 CFR 63.1303(a), that routes displaced vapors through activated carbon before being discharged to the atmosphere. The Permittee shall replace the existing carbon with fresh carbon upon indication of breakthrough before the next unloading event.

(b) Transfer pumps in diisocyanate service.
Each transfer pump in diisocyanate service shall meet the requirements of paragraph (b)(1) or (b)(2) below.
(1) The pump shall be a seal less pump; or
(2) The pump shall be a submerged pump system meeting the requirements in paragraphs (b)(2)(i) through (iii) listed below.
  (i) The pump shall be completely immersed in bis(2-ethylhexyl)phthalate (DEHP, CAS #118-81-7), 2(methyloctyl)phthalate (DINP, CAS #68515-48-0), or another neutral oil.
  (ii) The pump shall be visually monitored weekly to detect leaks,
  (iii) When a leak is detected, it shall be repaired in accordance with the procedures in paragraphs (b)(2)(iii)(A) and (B) below, except as provided in paragraph (d) below.
    (A) The leak shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected.
    (B) A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. First attempts at repair include, but are not limited to, the following practices where practicable:
      (1) Tightening of packing gland nuts.
      (2) Ensuring that the seal flush is operating at design pressure and temperature.

(c) Other components in diisocyanate service.
If evidence of a leak is found by visual, audible, or any other detection method, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in paragraph (d) below. The first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

(d) Delay of repair.
(1) Delay of repair of equipment for which leaks have been detected is allowed for equipment that is isolated from the process and that does not remain in diisocyanate service.
(2) Delay of repair for valves and connectors is also allowed if:
  (i) The owner or operator determines that diisocyanate emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair, and
  (ii) The purged material is collected and destroyed or recovered in a control device when repair procedures are effected.
(3) Delay of repair for pumps is also allowed if repair requires replacing the existing seal design with a seal less pump, and repair is completed as soon as practicable, but not later than 6 months after the leak was detected.

D.1.4 Flexible Polyurethane Foam Production NESHAP [326 IAC 2-7-5] [40 CFR Part 63.1299, Subpart III][326 IAC 20-22-1]

Pursuant to 40 CFR 63.1299, the Permittee shall comply with the source-wide emission limitation option provided in 40 CFR 63.1293(b) and shall control HAP ABA storage and equipment leak emissions, HAP ABA emissions from the production line (which includes the VPF line), and equipment cleaning HAP emissions in accordance with the provisions in 40 CFR 63.1299. Compliance shall be determined on a rolling annual basis in accordance with 40 CFR 63.1299(a).

(a) Rolling annual compliance.
Under the rolling annual compliance provisions, actual source-wide HAP ABA storage and equipment leak emissions, HAP ABA emissions from the production line, and equipment cleaning HAP emissions are compared to allowable source-wide emissions for each consecutive 12-month period. The allowable source-wide HAP emission level is calculated based on the production for the 12-month period, resulting in a potentially different allowable level for each 12-month period. While compliance is on an annual basis, compliance shall be determined monthly for the preceding 12-month period. The actual source-wide HAP emission level for a consecutive 12-month period shall be determined using the procedures in 40 CFR 63.1299(c)(1) through (4), listed in paragraphs (b)(1) through (4) below. The allowable HAP emission level for a consecutive 12-month period shall be determined using the procedures in 40 CFR 63.1299(d), listed in paragraph (c) below.

(b) Procedures for determining actual source-wide HAP emissions.
The actual source-wide HAP ABA storage and equipment leak emissions, HAP ABA emissions from the production line, and equipment cleaning HAP emissions shall be determined using the procedures in 40 CFR 63.1299. Actual source-wide HAP emissions for each individual month shall be determined using the procedures specified in paragraphs (b)(1) through (3) below.

(1) Actual source-wide HAP emissions for a month shall be determined using Equation 5 and the information determined in accordance with paragraphs (b)(2) and (3) below.

$$PWE_{actual} = \sum_{i}^{n} (ST_{i,\,begin} - ST_{i,\,end} + ADD_i) \qquad \text{(Equation 5)}$$

Where:

PWE_{actual} = Actual source-wide HAP ABA and equipment cleaning HAP emissions for a month, pounds/month.

n = Number of HAP ABA storage vessels.

$ST_{i,\,begin}$ = Amount of HAP ABA in storage vessel i at the beginning of the month, pounds, determined in accordance with the procedures listed in paragraph (b)(2) below.

$ST_{i,\,end}$ = Amount of HAP ABA in storage vessel i at the end of the month, pounds, determined in accordance with the procedures listed in paragraph (b)(2) below.

ADD_i = Amount of HAP ABA added to storage vessel i during the month, pounds, determined in accordance with the procedures listed in paragraph (b)(3) below.

(2) The amount of HAP ABA in a storage vessel shall be determined by monitoring the HAP ABA level in the storage vessel in accordance with 40 CFR 63.1303(d).

(3) The amount of HAP ABA added to a storage vessel for a given month shall be the sum of the amounts of all individual HAP ABA deliveries that occur during the month. The amount of each individual HAP ABA delivery shall be determined in accordance with 40 CFR 63.1303(e).

(4) Actual source-wide HAP emissions for each consecutive 12-month period shall be calculated as the sum of actual monthly source-wide HAP emissions for each of the individual 12 months in the period, calculated in accordance with paragraphs (b)(1) through (3) above.

(c) Allowable source-wide HAP emissions for a consecutive 12-month period shall be calculated as the sum of allowable monthly source-wide HAP emissions for each of the individual 12 months in the period. Allowable source-wide HAP emissions for each individual month shall be calculated using Equation 6.

$$emiss_{allow,\ month} = \sum_{j=1}^{m}\left(\sum_{i=1}^{n}\frac{(limit_i)(polyol_i)}{100}\right)j \qquad \text{(Equation 6)}$$

Where:

$emiss_{allow,\ month}$ = Allowable HAP ABA storage and equipment leak emissions, HAP ABA emissions from the production line, and equipment cleaning HAP emissions from the slabstock foam production source for the month, pounds.

m = Number of slabstock foam production lines.

$polyol_i$ = Amount of polyol used in the month in the production of foam grade i on foam production line j, determined in accordance with 40 CFR 63.1303(b), pounds.

n = Number of foam grades produced in the month on foam production line j.

$limit_i$ = HAP ABA formulation limit for foam grade i, parts HAP ABA per 100 parts polyol. The HAP ABA formulation limits are determined in accordance with 40 CFR 63.1297(d).

D.1.5 Flexible Polyurethane Foam Production NESHAP [326 IAC 2-7-5] [40 CFR Part 63.1301, Subpart III][326 IAC 20-22-1]

The requirements of 40 CFR 63.1301 apply to the four (4) Rebond mold units. Pursuant to 40 CFR 63.1301, the Permittee shall comply with the provisions in paragraphs (a) and (b) below.

(a) A HAP or HAP-based material shall not be used as an equipment cleaner at a rebond foam source.

(b) A HAP-based mold release agent shall not be used in a rebond foam source.

D.1.6 Monitoring Requirements [40 CFR 63.1303, Subpart III][326 IAC 20-22-1]

Pursuant to 40 CFR 63.1303, the Permittee shall comply with each applicable monitoring provision of 40 CFR 63.1303 as listed below.

(a) Monitoring requirements for storage vessel carbon adsorption systems.
The Permittee using a carbon adsorption system to meet the requirements of 40 CFR 63.1294(a) shall monitor the concentration level of the HAP or the organic compounds in the exhaust vent stream (or outlet stream exhaust) from the carbon adsorption system at the frequency specified in (a)(1) or (2) below in accordance with either (a)(3) or (4) below.

(1) The concentration level of HAP or organic compounds shall be monitored during each unloading event, or once per month during an unloading event if multiple unloading events occur in a month.

(2) As an alternative to monthly monitoring, the Permittee can set the monitoring frequency at an interval no greater than 20 percent of the carbon replacement interval, which is established using a design analysis described below in paragraphs (a)(2)(i) through (iii).

(i) The design analysis shall consider the vent stream composition, constituent concentration, flow rate, relative humidity, and temperature.
(ii) The design analysis shall establish the outlet organic concentration level, the capacity of the carbon bed, and the working capacity of activated carbon used for the carbon bed, and
(iii) The design analysis shall establish the carbon replacement interval based on the total carbon working capacity of the carbon adsorption system and the schedule for filling the storage vessel.

(3) Measurements of HAP concentration shall be made using 40 CFR part 60, appendix A, Method 18. The measurement shall be conducted over at least one 5-minute interval during which the storage vessel is being filled.

(4) Measurements of organic compounds shall be made using 40 CFR part 60, Appendix A, Method 25A. The measurement shall be conducted over at least one 5-minute interval during which the storage vessel is being filled.

(b) Monitoring for HAP ABA and polyol added to the foam production line (which includes the existing flat block pour line and the new VPF line) at the mixhead.

(1) The Permittee shall comply with the provisions in paragraph (b)(1)(i) below.
(i) The Permittee shall continuously monitor the amount of polyol added at the mixhead when foam is being poured, in accordance with paragraphs (b)(2) through (4) below.

(2) The owner or operator shall monitor either:
(i) Pump revolutions; or
(ii) Flow rate.

(3) The device used to monitor the parameter from paragraph (b)(2) shall have an accuracy to within +/- 2.0 percent of the HAP ABA being measured, and shall be calibrated initially, and periodically, in accordance with paragraph (b)(3)(i) or (ii) below.
(i) For polyol pumps, the device shall be calibrated at least once each 6 months.
(ii) For HAP ABA pumps, the device shall be calibrated at least once each month.

(4) Measurements must be recorded at the beginning and end of the production of each grade of foam within a run of foam.

(c) Monitoring of HAP ABA in a storage vessel.
The amount of HAP ABA in a storage vessel shall be determined weekly by monitoring the HAP ABA level in the storage vessel using a level measurement device that meets the criteria described in paragraphs (c)(1) and either (c)(2) or (c)(3) below.

(1) The level measurement device must be calibrated initially and at least once per year thereafter.

(2) With the exception of visually-read level measurement devices (i.e., gauge glass), the device must have either a digital or printed output.

(3) If the level measurement device is a visually-read device, the device must be equipped with permanent graduated markings to indicate HAP ABA level in the storage tank.

(d) Monitoring of HAP ABA added to a storage vessel.
The amount of HAP ABA added to a storage vessel during a delivery shall be determined in accordance with either paragraphs (d)(1), (2), or (3) of this section.

(1) The volume of HAP ABA added to the storage vessel shall be determined by recording the volume in the storage vessel prior to the delivery and the volume after the delivery, provided that the storage tank level measurement device used to determine the levels meets the criteria in paragraph (c) above.

(2) The volume of HAP ABA added to the storage vessel shall be determined by monitoring the flow rate using a device with an accuracy of +/- 2.0 percent, and calibrated initially and at least once each six months thereafter.

(3) The weight of HAP ABA added to the storage vessel shall be calculated as the difference of the full weight of the transfer vehicle prior to unloading into the storage vessel and the empty weight of the transfer vehicle after unloading into the storage vessel. The weight shall be determined using a scale meeting the requirements of either paragraph (d)(3)(i) or (ii) below.

(i) A scale approved by the State or local agencies using the procedures contained in Handbook 44, Specifications, Tolerances, and Other Technical Requirements for Weighing and Measuring Devices 1998 (incorporation by reference--see 40 CFR 63.14).

(ii) A scale determined to be in compliance with the requirements of the National Institute of Standards and Technology Handbook 44 at least once per year by a registered scale technician.

D.1.7 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), First Significant Source Modification No. 033-13706-00047, issued on June 25, 2001 and Second Significant Source Modification No. 033-15727-00047, issued on November 26, 2003, the Best Available Control Technology (BACT) for the VPF line shall be the following:

(a) Operation of the carbon adsorber to control total VOC emissions from the VPF line at all times that the VPF line is in operation. The carbon adsorber shall operate at a minimum total VOC (including TDI, MDI, and tertiary amine VOC) overall control efficiency of 51%.

(b) The production of polyurethane foam in the VPF line shall be limited to a maximum of 800,000,000 board feet per year. This production limit will limit the usage of tertiary amines and TDI such that the emissions of VOC will be limited to 14.6 tons per year after control by the carbon adsorber.

Emissions shall be calculated using the following:

(1) VOC emissions from amine catalyst usage in the VPF line shall be calculated using the following equation:
VOC emissions from VPF line (tons) =
Amine catalyst usage (gal) x density (lbs/gal) x tertiary amine % (weight) x 1 ton / 2000 lbs x (1 - overall tertiary amine control efficiency of carbon adsorber on VPF line)

(A) The amine catalyst is comprised of volatile organics and non-volatile organics that are consumed in foam production process. Based on manufacturer's data, the volatile organic constituent of the amine catalyst is the tertiary amine. Therefore, VOC emissions from the amine catalyst shall be equivalent to the percent by weight of the tertiary amine constituent as shown above.

(B) VOC emissions from TDI and MDI usage in the VPF line shall be calculated using the following equation:

VOC emissions from VPF line (tons) =
TDI or MDI usage (lbs) x 0.0016% x 1 ton / 2000 lbs x (1 - overall VOC control efficiency of carbon adsorber on VPF line)

where:

TDI or MDI usage (lbs) = TDI or MDI containing pre-polymer usage (gal) x density (lbs/gal) x TDI or MDI % (weight)

(C) VOC emissions from the VPF line shall be calculated based on the use of a carbon adsorber with a minimum total VOC (including TDI, MDI, and tertiary amine VOC) overall control efficiency of 51%.

D.1.8 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the four (4) rebond mold unit facilities (EU-R1, EU-R2, EU-R3, EU-R4) shall not exceed a total of 18.66 pounds per hour when operating at a total process weight rate of 9.6 tons per hour.

The pounds per hour limitation was calculated with 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.1.9 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the VPF line and any control devices.

Compliance Determination Requirements

D.1.10 Testing Requirements [40 CFR 63.1304, Subpart III][326 IAC 2-7-6(1),(6)][326 IAC 20-22-1]

Pursuant to 40 CFR 63.1304, the Permittee shall use the test methods listed below, as applicable, to demonstrate compliance with Subpart III.

(a) Test method to determine foam properties.
The IFD and density of each grade of foam produced during each run of foam shall be determined using ASTM D3574-91, Standard Test Methods for Flexible Cellular Materials--Slab, Bonded, and Molded (incorporation by reference--see 40 CFR 63.14), using a sample of foam cut from the center of the foam bun. The maximum sample size for which the IFD and density is determined shall not be larger than 24 inches by 24 inches by 4 inches. For grades of foam where the Permittee has designated the HAP ABA formulation limitation as zero, the Permittee is not required to determine the IFD and density in accordance with this paragraph.

D.1.11 Compliance Demonstrations [40 CFR 63.1308, Subpart III][326 IAC 20-22-1]

Pursuant to 40 CFR 63.1308,

(a) For the Permittee, compliance with the requirements listed in paragraphs (a)(1) through (a)(2) below shall mean compliance with the requirements contained in 40 CFR 63.1293 through 63.1301, absent any credible evidence to the contrary.
  (1) The requirements described in Tables 3, 4, and 5 of Subpart III; and
  (2) The requirement to submit a compliance certification annually as required under 40 CFR 63.1306(g).

(b) All slabstock affected sources.
For slabstock affected sources, failure to meet the requirements contained in 40 CFR 63.1294 shall be considered a violation of this subpart. Violation of each item listed in the paragraphs (b)(1) through (b)(6) below, as applicable, shall be considered a separate violation.
  (1) For the Permittee complying with 40 CFR 63.1294(a) in accordance with 40 CFR 63.1294(a)(1), each unloading event that occurs when the diisocyanate storage vessel is not equipped with a vapor return line from the storage vessel to the tank truck or rail car, each unloading event that occurs when the vapor line is not connected, each unloading event that the vapor line is not inspected for leaks as described in 40 CFR 63.1294(a)(1)(i), each unloading event that occurs after a leak has been detected and not repaired, and each calendar day after a leak is detected, but not repaired as soon as practicable;

(2) For the Permittee complying with 40 CFR 63.1294(a) in accordance with 40 CFR 63.1294(a)(2), each unloading event that the diisocyanate storage vessel is not equipped with a carbon adsorption system, each unloading event (or each month if more than one unloading event occurs in a month) that the carbon adsorption system is not monitored for breakthrough in accordance with 40 CFR 63.1303(a)(3) or (4), and each unloading event that occurs when the carbon is not replaced after an indication of breakthrough;

(3) For the Permittee complying with 40 CFR 63.1294(a) in accordance with 40 CFR 63.1294(a)(2) through the alternative monitoring procedures in 40 CFR 63.1303(a)(2), each unloading event that the diisocyanate storage vessel is not equipped with a carbon adsorption system, each time that the carbon adsorption system is not monitored for breakthrough in accordance with 40 CFR 63.1303(a)(3) or (4) at the interval established in the design analysis, and each unloading event that occurs when the carbon is not replaced after an indication of breakthrough;

(4) For the Permittee complying with 40 CFR 63.1294(b) in accordance with 40 CFR 63.1294(b)(1), each calendar day that a transfer pump in diisocyanate service is not a seal less pump;

(5) For the Permittee complying with 40 CFR 63.1294(b) in accordance with 40 CFR 63.1294(b)(2), each calendar day that a transfer pump in diisocyanate service is not submerged as described in 40 CFR 63.1294(b)(2)(i), each week that the pump is not visually monitored for leaks, each calendar day after 5 calendar days after detection of a leak that a first attempt at repair has not been made in accordance with 40 CFR 63.1294(b)(2)(iii)(B), and the earlier of each calendar day after 15 calendar days after detection of a leak that a leak is not repaired, or a leak is not repaired as soon as practicable, each subsequent calendar day (with the exception of situations meeting the criteria of 40 CFR 63.1294(d));

(6) For each affected source complying with 40 CFR 63.1294(c), each calendar day after 5 calendar days after detection of a leak that a first attempt at repair has not been made, and the earlier of each calendar day after 15 calendar days after detection of a leak that a leak is not repaired, or if a leak is not repaired as soon as practicable, each subsequent calendar day (with the exception of situations meeting the criteria of 40 CFR 63.1296(f)).

(c) Slabstock affected sources complying with the source-wide emission limitation. For the Permittee complying with the source-wide emission limitation as provided in 40 CFR 63.1293(b), failure to meet the requirements contained in 40 CFR 63.1299 shall be considered a violation of this subpart. Violation of each item listed in paragraph (c)(1) below, as applicable, shall be considered a separate violation.

(1) For each affected source complying with 40 CFR 63.1299 in accordance with the rolling annual compliance option in 40 CFR 63.1299(a), each calendar day in the 12-month period for which the actual HAP ABA emissions exceeded the allowable HAP ABA emissions level, each calendar day in which foam is being poured where the amount of polyol added at the mixhead is not monitored (as required) in accordance with 40 CFR 63.1303(b)(1)(i), each calendar day in a week in which the amount of HAP ABA in a storage vessel is not determined in accordance with 40 CFR 63.1303(d), each delivery of HAP ABA in which the amount of HAP ABA added to the storage vessel is not determined in accordance with 40 CFR 63.1303(e), each calendar day in a 6-month period in which the polyol pumps are not calibrated in accordance with 40 CFR 63.1303(b)(3)(i), and each calendar day after 10 working days after production where the IFD and density of a foam grade are not determined (where required) in accordance with 40 CFR 63.1304(b);

(d) Molded and rebond foam affected sources.

For the Permittee, a rebond foam affected source, failure to meet the requirements contained in 40 CFR 63.1301 shall be considered a violation of this subpart. Violation of each item listed in the following paragraphs shall be considered a separate violation.

(1) For each rebond foam affected source subject to the provisions of 40 CFR 63.1301(a), each calendar day that a HAP-based material is used as an equipment cleaner; and

(2) For each rebond foam affected source complying with 40 CFR 63.1301(b), each calendar day that a HAP-based mold release agent is used.

D.1.12 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

(a) During the period between January, 2007 and June, 2007, the Permittee shall perform VOC testing on the four (4) rebond molding units (EU-R1, EU-R2, EU-R3, EU-R4), to confirm the VOC emissions, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

(b) During the period between January, 2007 and June, 2007, in order to demonstrate compliance with condition D.1.8, the Permittee shall perform PM testing on the four (4) rebond molding units (EU-R1, EU-R2, EU-R3, EU-R4) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

(c) In order to demonstrate compliance with Condition D.1.7, the Permittee shall perform VOC testing by no later than May, 2007, on the carbon adsorber controlling VOC emissions from the VPF line utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.13 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Condition D.1.7 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.14 VOC Emissions Control

(a) The carbon adsorber controlling VOC emissions from the VPF line shall be in operation at all times that the VPF line is in operation to ensure compliance with condition D.1.7.

(b) The carbon adsorber controlling VOC emissions from the VPF line shall maintain a minimum total VOC overall control efficiency of 51%.

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

D.1.15 Record Keeping Requirements [40 CFR 63.1307, Subpart III][326 IAC 20-22-1]

Pursuant to 40 CFR 63.1307, the applicable records designated in paragraphs (a) through (c) below shall be maintained by the Permittee.

(a) Storage vessel records.

(1) A list of diisocyanate storage vessels, along with a record of the type of control utilized for each storage vessel.

(2) For storage vessels complying through the use of a carbon adsorption system, the records listed in paragraphs (a)(2)(i) or (ii), and paragraph (a)(2)(iii) of this section.

(i) Records of dates and times when the carbon adsorption system is monitored for carbon breakthrough and the monitoring device reading, when the device is monitored in accordance with 40 CFR 63.1303(a); or

(ii) For affected sources monitoring at an interval no greater than 20 percent of the carbon replacement interval, in accordance with 40 CFR 63.1303(a)(2), the records listed in paragraphs (a)(2)(ii)(A) and (B) below.

(A) Records of the design analysis, including all the information listed in 40 CFR 63.1303(a)(2)(i) through (iii), and

(B) Records of dates and times when the carbon adsorption system is monitored for carbon breakthrough and the monitoring device reading.

(iii) Date when the existing carbon in the carbon adsorption system is replaced with fresh carbon.

(3) For storage vessels complying through the use of a vapor return line, paragraphs (a)(3)(i) through (iii) below.

(i) Dates and times when each unloading event occurs and each inspection of the vapor return line for leaks occurs.

(ii) Records of dates and times when a leak is detected in the vapor return line.

(iii) Records of dates and times when a leak is repaired.

(b) Equipment leak records.

(1) A list of components as specified below in paragraph (b)(1)(i).

(i) For all affected sources, a list of components in diisocyanate service,

(2) For transfer pumps in diisocyanate service, a record of the type of control utilized for each transfer pump and the date of installation.

(3) When a leak is detected as specified in 40 CFR 63.1294(b)(2)(ii) and 40 CFR 63.1294(c), the requirements listed in paragraphs (b)(3)(i) and (ii) below apply:

(i) Leaking equipment shall be identified in accordance with the requirements in paragraphs (b)(3)(i)(A) and (B) below.

(A) A readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment.

(B) The identification on equipment, other than a valve, may be removed after it has been repaired.

(ii) The information in paragraphs (b)(3)(ii)(A) through (H) shall be recorded for leaking components.

(A) The instrument and operator identification numbers and the equipment identification number.

(B) The date the leak was detected and the dates of each attempt to repair the leak.

(C) Repair methods applied in each attempt to repair the leak.

(D) The words “above leak definition" if the maximum instrument reading measured by the methods specified in 40 CFR 63.1304(a) after each repair attempt is equal or greater than the leak definitions for the specified equipment.

(E) The words “repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.

(F) The expected date of the successful repair of the leak if a leak is not repaired within 15 calendar days.

(G) The date of successful repair of the leak.

(H) The date the identification is removed.

(c) HAP ABA records.

(1) Source-wide limitations - rolling annual compliance and monthly compliance alternative records.

The Permittee complying with the source-wide limitations of 40 CFR 63.1299, and the rolling annual compliance provisions in 40 CFR 63.1299(a), shall maintain the records listed in paragraphs (c)(1)(i) through (c)(1)(vii) below.

(i) Daily records of the information listed in paragraphs (c)(1)(i)(A) through (C) of this section.

(A) A log of foam runs each day. For each run, the log shall include a list of the grades produced during the run.

(B) Results of the density and IFD testing for each grade of foam produced during each run of foam, conducted in accordance with the procedures in 40 CFR 63.1304(b). The results of this testing shall be recorded within 10 working days of the production of the foam. For grades of foam where the Permittee has designated the HAP ABA formulation limitation as zero, the Permittee is not required to keep records of the IFD and density.

(C) With the exception of those grades for which the Permittee has designated zero as the HAP ABA formulation limitation, the amount of polyol added to the slabstock foam production line at the mixhead for each grade produced during each run of foam, determined in accordance with 40 CFR 63.1303(b).

(ii) For sources complying with the source-wide emission limitation, weekly records of the storage tank level, determined in accordance with 40 CFR 63.1303(d).

(iii) Monthly records of the information listed below in paragraphs (c)(1)(iii)(A) through (E).

(A) A listing of all foam grades produced during the month,

(B) For each foam grade produced, the residual HAP formulation limitation, calculated in accordance with 40 CFR 63.1297(d).

(C) With the exception of those grades for which the Permittee has designated zero as the HAP ABA formulation limitation, the total amount of polyol used in the month for each foam grade produced.

(D) The total allowable HAP ABA and equipment cleaning emissions for the month, determined in accordance with 40 CFR 63.1297(b)(2).

(E) The total actual source-wide HAP ABA emissions for the month, determined in accordance with 40 CFR 63.1299(c)(1), along with the information listed in paragraphs (c)(1)(iii)(E)(1) and (2) below.

(1) The amounts of HAP ABA in the storage vessel at the beginning and end of the month, determined in accordance with 40 CFR 63.1299(c)(2); and

(2) The amount of each delivery of HAP ABA to the storage vessel, determined in accordance with 40 CFR 63.1299(c)(3).

(iv) Each source complying with the rolling annual compliance provisions of 40 CFR 63.1299(a) shall maintain the records listed in paragraphs (c)(1)(iv)(A) and (B) below.

(A) The sum of the total allowable HAP ABA and equipment cleaning HAP emissions for the month and the previous 11 months.

(B) The sum of the total actual HAP ABA and equipment cleaning HAP emissions for the month and the previous 11 months.

(v) Records of all calibrations for each device used to measure polyol added at the mixhead, conducted in accordance with 40 CFR 63.1303(b)(3).

(vi) Records of all calibrations for each device used to measure the amount of HAP ABA in the storage vessel, conducted in accordance with 40 CFR 63.1303(d)(1).

(vii) Records to verify that all scales used to measure the amount of HAP ABA added to the storage vessel meet the requirements of 40 CFR 63.1303(e)(3). For scales meeting the criteria of 40 CFR 63.1303(e)(3)(i), this documentation shall be in the form of written confirmation of the State or local approval. For scales complying with 40 CFR 63.1303(e)(3)(ii), this documentation shall be in the form of a report provided by the registered scale technician.

(d) The Permittee following the compliance methods in 40 CFR 63.1308(b)(1) and (c)(1) shall maintain records of each use of a vapor return line during unloading, of any leaks detected during unloading, and of repairs of leaks detected during unloading.

(e) The Permittee subject to 40 CFR 63.1300 or 40 CFR 63.1301 of this subpart shall maintain a product data sheet for each compound other than diisocyanates used to flush the mixhead and associated piping during periods of startup or maintenance, which includes the HAP content, in kg of HAP/kg solids (lb HAP/lb solids), of each solvent other than diisocyanates used to flush the mixhead and associated piping during periods of startup or maintenance.

(f) The Permittee subject to 40 CFR 63.1300 or Sec. 63.1301 of this subpart shall maintain a product data sheet for each mold release agent used that includes the HAP content, in kg of HAP/kg solids (lb HAP/lb solids), of each mold release agent.

D.1.16 Record Keeping Requirements

(a) To document compliance with Condition D.1.7, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.7. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The amount and VOC (tertiary amine) content of each amine catalyst and other raw material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) A log of the month of use;

(3) The total VOC usage, including tertiary amine usage, for each month; and

(4) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.9, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.17 Reporting Requirements [40 CFR 63.1306, Subpart III][326 IAC 20-22-1]

Pursuant to 40 CFR 63.1306, the Permittee shall comply with each applicable reporting provision in this section.

(a) Initial notification.
The Permittee shall submit an initial notification in accordance with 40 CFR 63.9(b).

(b) Application for approval of construction or reconstruction.
The Permittee shall submit an application for approval of construction or reconstruction in accordance with the provisions of 40 CFR 63.5(d).

(c) Precompliance report.
The Permittee shall submit a precompliance report no later than 12 months before the compliance date. This report shall contain the information listed in paragraphs (c)(1) through (c)(8) below, as applicable.

(1) Whether the source will comply with the emission point specific limitations described in 40 CFR 63.1293(a), or with the source-wide emission limitation described in 40 CFR 63.1293(b).

(2) For a source complying with the emission point specific limitations, whether the source will comply on a rolling annual basis in accordance with 40 CFR 63.1297(b), or will comply with the monthly alternative for compliance contained in 40 CFR 63.1297(c).

(3) For a source complying with the source-wide emission limitation, whether the source will comply on a rolling annual basis in accordance with 40 CFR 63.1299(a), or will comply with the monthly alternative for compliance contained in 40 CFR 63.1299(b).

(4) A description of how HAP ABA and/or polyol added at the mixhead will be monitored. If the owner or operator is developing an alternative monitoring program, the alternative monitoring program containing the information in 40 CFR 63.1303(b)(5)(i) through (iv) shall be submitted.

(5) Notification of the intent to use a recovery device to comply with the provisions of 40 CFR 63.1297 or 40 CFR 63.1299.

(6) For slabstock affected sources complying with 40 CFR 63.1297 or 40 CFR 63.1299 using a recovery device, the continuous recovered HAP ABA monitoring and record keeping program, developed in accordance with 40 CFR 63.1303(c).

(7) For sources complying with the source-wide emission limitation, a description of how the amount of HAP ABA in a storage vessel shall be determined.

(8) For sources complying with the source-wide emission limitation, a description of how the amount of HAP ABA added to a storage vessel during a delivery will be monitored. If the owner or operator is developing an alternative monitoring program, the alternative monitoring program containing the information in 40 CFR 63.1303(e)(4)(i) through (iv) shall be submitted.

(9) If the Administrator does not notify the owner or operator of objections to an alternative monitoring program submitted in accordance with (c)(4) or (c)(6) above, or a recovered HAP ABA monitoring and record keeping program submitted in accordance with (c)(7) above, the program shall be deemed approved 45 days after its receipt by the Administrator.

(d) Notification of compliance status.

The Permittee shall submit a notification of compliance status report no later than 180 days after the compliance date. For slabstock affected sources, this report shall contain the information listed in paragraphs (d)(1) and (2) below, as applicable. This report shall contain the information listed in paragraph (d)(3) for rebond foam processes.

(1) A list of diisocyanate storage vessels, along with a record of the type of control utilized for each storage vessel.

(2) For transfer pumps in diisocyanate service, a record of the type of control utilized for each transfer pump.

(3) A statement that the rebond foam affected source is in compliance with 40 CFR 63.1301, or that rebond processes at an affected source are in compliance with 40 CFR 63.1301.

(e) Semiannual reports.

The Permittee shall submit a report containing the information specified in paragraphs (e)(1) through (4) below semiannually no later than 60 days after the end of each 180 day period. The first report shall be submitted no later than 240 days after the date that the Notification of Compliance Status is due and shall cover the 6-month period beginning on the date that the Notification of Compliance Status Report is due.

(1) For slabstock affected sources complying with the rolling annual compliance provisions of 40 CFR 63.1299, the allowable and actual HAP ABA emissions (or allowable and actual source-wide HAP emissions) for each of the 12-month periods ending on each of the six months in the reporting period. This information is not required to be included in the initial semi-annual compliance report.

(2) For sources complying with the storage vessel provisions of 40 CFR 63.1294(a) using a carbon adsorption system, unloading events that occurred after breakthrough was detected and before the carbon was replaced.

(3) Any equipment leaks that were not repaired in accordance with 40 CFR 63.1294(b)(2)(iii) and 40 CFR 63.1294(c).

(4) Any leaks in vapor return lines that were not repaired in accordance with 40 CFR 63.1294(a)(1)(ii).

(f) Other reports.

(1) Change in selected emission limitation.

The Permittee electing to change their slabstock flexible polyurethane foam emission limitation (from emission point specific limitations to a source-wide emission limitation, or vice versa), selected in accordance with 40 CFR 63.1293, shall notify the Administrator no later than 180 days prior to the change.

(2) Change in selected compliance method.
The Permittee changing the period of compliance for 40 CFR 63.1299 (between rolling annual and monthly) shall notify the Administrator no later than 180 days prior to the change.

(g) Annual compliance certifications.
The Permittee subject to the provisions in 40 CFR 63.1293 through 63.1301 shall submit a compliance certification annually.

(1) The compliance certification shall be based on information consistent with that contained in 40 CFR 63.1308 of this section, as applicable.

(2) A compliance certification required pursuant to a State or local operating permit program may be used to satisfy the requirements of this section, provided that the compliance certification is based on information consistent with that contained in 40 CFR 63.1308 of this section, and provided that the Administrator has approved the State or local operating permit program under part 70 of this chapter.

(3) Each compliance certification submitted pursuant to this section shall be signed by a responsible official of the company that owns or operates the affected source.

D.1.18 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.7 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(e) three (3) natural gas-fired industrial boilers identified as Boilers #1, #2 and #3 (EU-B1, EU-B2, EU-B3), each rated at 10.5 million (MM) British thermal units (Btu) per hour and exhausted through three (3) stacks (S/V ID 31,32,33), respectively. Boilers #1 and #2 were installed in 1978 and Boiler #3 was installed in 1986.

(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 2-7-5(1)]

D.2.1 Particulate [326 IAC 6-2-3] [326 IAC 6-2-4]

(a) Pursuant to 326 IAC 6-2-3(e) (Particulate Matter Emissions Limitations for Sources of Indirect Heating), the PM emissions from each of Boiler #1 (EU-B1) and Boiler #2 (EU-B2), (each rated at 10.5 mmBtu per hour), which began operation after June 8, 1972, shall not exceed 0.6 pounds per mmBtu heat input each.

(b) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the PM emissions from the 10.5 mmBtu per hour heat input Boiler #3 (EU-B3) (installed in 1986) shall not exceed 0.44 pounds per mmBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = Pounds of particulate matter emitted per MMBtu heat input.
Q = Total source maximum operating capacity rating of indirect heating facilities in MMBtu per hour.

D.2.2 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source, as designated by 40 CFR 63.7506(b). The Permittee must comply with these requirements on and after the effective date of 40 CFR 63, Subpart DDDDD.

D.2.3 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters [40 CFR Part 63, Subpart DDDDD]

(a) The affected source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, (40 CFR 63, Subpart DDDDD), as of the effective date of 40 CFR 63, Subpart DDDDD. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart DDDDD on and after three years after the effective date of 40 CFR 63, Subpart DDDDD.

(b) The following emissions units comprise the affected source for the large gaseous fuel subcategory: Boiler #1 (EU-B1) and Boiler #2 (EU-B2).

(c) The definitions of 40 CFR 63, Subpart DDDDD at 40 CFR 63.7575 are applicable to the affected source.

Compliance Determination Requirements

D.2.4 Natural Gas

In order to demonstrate compliance with D.2.1, the source shall burn only natural gas.

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

D.2.5 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters - Notification Requirements [40 CFR 63, Subpart DDDDD]

(a) Pursuant to 40 CFR 63.7545(a) and 40 CFR 63.7506(b), the Permittee shall submit an Initial Notification containing the information specified in 40 CFR 63.9(b)(2) not later than 120 days after the effective date of 40 CFR 63, Subpart DDDDD as required by 40 CFR 63.7545(b).

(b) The notification required by paragraph (a) shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

The notification requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (one (1) 100% petroleum distillate Safety-Kleen parts washer, installed in 2002, with a remote solvent reservoir). [326 IAC 8-3-2]

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]

(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 2-7-5(1)] (Cold Cleaning Degreaser Operations)

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Process Weight Activities

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

D.3.2 Particulate [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. This limitation applies to the following insignificant activities:

(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Foamex, L.P.
Source Address: 2211 South Wayne St., Auburn, IN 46706
Mailing Address: 2211 South Wayne St., Auburn, IN 46706
Part 70 Permit No.: T033-17552-00047

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:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Foamex, L.P.
Source Address: 2211 South Wayne St., Auburn, IN 46706
Mailing Address: 2211 South Wayne St., Auburn, IN 46706
Part 70 Permit No.: T033-17552-00047

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

- C The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- C The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Foamex, L.P.
Source Address: 2211 South Wayne St., Auburn, IN 46706
Mailing Address: 2211 South Wayne St., Auburn, IN 46706
Part 70 Permit No.: T033-17552-00047
Facility: VPF Line
Parameter: VOC Emissions
Limit: The production of polyurethane foam in the VPF line shall be limited to a maximum of 800,000,000 board feet per year. This production limit will limit the usage of tertiary amines and TDI such that the emissions of VOC will be limited to 14.6 tons per year after control by the carbon adsorber. VOC emissions shall be calculated using the methodology described in condition D.1.7.

YEAR: _____

Month	Total Board Ft. of Foam Produced this month	Column 1	Column 2	Column 1 + Column 2
		Total VOC Emissions This Month (tons)	Total VOC Emissions Previous 11 Months (tons)	12 Month Total VOC Emissions (tons)
Month 1				
Month 2				
Month 3				

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Foamex, L.P.
Source Address: 2211 South Wayne St., Auburn, IN 46706
Mailing Address: 2211 South Wayne St., Auburn, IN 46706
Part 70 Permit No.: T033-17552-00047

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	**Foamex, L.P.**
Source Location:	**2211 South Wayne Street, Auburn, Indiana 46706**
County:	**DeKalb**
SIC Code:	**3086**
Operation Permit No.:	**033-7625-00047**
Operation Permit Issuance Date:	**November 11, 1998**
Permit Renewal No.:	**033-17552-00047**
Permit Reviewer:	**Trish Earls/EVP**

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Foamex, L.P. relating to the operation of a Flexible Polyurethane Foam Production plant.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Four (4) Rebond mold units, identified as EU-R1, EU-R2, EU-R3, and EU-R4, with EU-R1 and EU-R2 constructed in 1980 and EU-R3 and EU-R4 constructed in 1995, with a total maximum capacity of bonding 9.6 tons per hour of scrap foam, exhausted through four (4) stacks (S/V ID 28, 29, 35, 36), respectively;

(b) One (1) source-wide adhesive application operation, with emissions venting inside the plant;

(c) One (1) source-wide chemical cleaning solvent usage operation, with emissions venting inside the plant;

(d) one (1) Variable Pressure Foaming (VPF) line, constructed in 2001, with a maximum capacity of producing 800,000,000 board feet of foam per year, with a carbon adsorber to control VOC emissions, exhausted through two (2) stacks (ID Nos. 39 and 40). Alternately, this line also has the capacity to produce a small amount of foam by pouring and using a maximum of 4,000,000 pounds per year of MDI and 447,329 pounds per year of methylene chloride; and

(e) three (3) natural gas-fired industrial boilers identified as Boilers #1, #2 and #3 (EU-B1, EU-B2, EU-B3), each rated at 10.5 million (MM) British thermal units (Btu) per hour and exhausted through three (3) stacks (S/V ID 31,32,33), respectively. Boilers #1 and #2 were installed in 1978 and Boiler #3 was installed in 1986.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Emission Units and Pollution Control Equipment Removed From This Source

The following permitted emission units have been removed from this source:

(a) One (1) flat block pour line, identified as EU-PL, with a maximum capacity of producing 4.8×10^8 board feet of foam per year, and exhausted through seven (7) stacks (S/V ID 1,2,3,4,5,6,7). This facility was installed in November of 1977;

(b) Two (2) Flame Laminators, identified as Flame Laminator #1 (EU-F1) and Flame Laminator #2 (EU-F2), each with a maximum capacity to finish 3.504×10^8 square feet per year of polyurethane foam. Flame Laminator #1, installed in 1978, is exhausted through two (2) stacks (S/V ID 15,16), and Flame Laminator #2, installed in 1993, is exhausted through one (1) stack (S/V ID 34).

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(b) Propane or liquefied petroleum gas, or butane fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.

(c) The following VOC and HAP storage containers:
  (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
  (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (one (1) 100% petroleum distillate Safety-Kleen parts washer, installed in 2002, with a remote solvent reservoir). [326 IAC 8-3-2]

(e) Cleaners and solvents characterized as follows:
  (1) having a vapor pressure equal to or less than 2kPa; 15 mmHg; or 0.3 psi measured at 38 degrees C (100 F) or;
  (2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees Celsius (68 F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]

(g) Closed loop heating and cooling systems.

(h) Infrared cure equipment.

(i) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(j) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(k) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(l) Heat exchanger cleaning and repair.

(m) Process vessel degassing and cleaning to prepare for internal repairs.

(n) Paved and unpaved roads and parking lots with public access.

(o) Blowdown of any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(p) Gasoline emergency generators not exceeding 110 horsepower.

(q) Stationary fire pumps.

(r) Purge double block and bleed valves.

(s) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees Celsius).

(t) two (2) Baumer loop slitters using an n-propyl bromide based adhesive;

(u) The following units emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:

(1) TDI/MDI Storage Tanks; [40 CFR 63, Subpart III]
(2) Filler handling and storage;
(3) Hot wire Seamers;
(4) Hot Roll Laminator

(v) The following activities not previously identified with emissions equal to or less than insignificant thresholds;

(1) Ink handling and applications - VOC emissions less than 3 lbs/hr or 15 lbs/day;
(2) Resin storage tanks -VOC emissions less than 3 lbs/hr or 15 lbs/day;
(3) Amines storage tanks - VOC emissions less than 3 lbs/hr or 15 lbs/day;
(4) Fire retardant storage tanks - VOC emissions less than 3 lbs/hr or 15 lbs/day;
(5) Hot roll (drum) Laminator - VOC emissions less than 3 lbs/hr or 15 lbs/day;
(6) One (1) 250 gallon storage tank for process oil, identified as T-30, constructed in 1978 - VOC emissions less than 3 lbs/hr or 15 lbs/day;
(7) One (1) 6,000 gallon storage tank for process oil, identified as T-9, constructed in 1978 - VOC emissions less than 3 lbs/hr or 15 lbs/day;
(8) One (1) 7,000 gallon storage tank for process oil, identified as T-33, constructed in 2000 - VOC emissions less than 3 lbs/hr or 15 lbs/day;
(9) One (1) 10,000 gallon storage tank for process oil, identified as T-21, constructed in 1980 - VOC emissions less than 3 lbs/hr or 15 lbs/day;
(10) One (1) 6,000 gallon rebond binder tank, constructed in 1997 - VOC emissions less than 3 lbs/hr or 15 lbs/day; and
(11) One (1) 1,000 gallon rebond binder scale tank, constructed in 1997 - VOC emissions less than 3 lbs/hr or 15 lbs/day.

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

(a) T033-7625-00047, issued on November 11, 1998;

(b) First Significant Source Modification No.: 033-13706-00047, issued on June 25, 2001;

(c) First Significant Permit Modification No.: 033-14184-00047, issued on July 17, 2001;

(d) First Reopening to a Part 70 Operating Permit No.: R-033-13180-00047, issued on November 30, 2001;

(e) Second Significant Source Modification No.: 033-15727-00047, issued on November 26, 2003; and

(f) Second Significant Permit Modification No.: 033-15909-00047, still pending.

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.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this Part 70 permit:

(a) Condition D.1.6

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 2-2]

The polyurethane foam production plant shall limit the VOC emissions from the emission units identified as the pourline (EU-PL), flame laminators #1 and #2 (EU-F1, EU-F2), four (4) rebond molding units (EU-R1, EU-R2, EU-R3, EU-R4), three (3) natural gas boilers (EU-B1,EU-B2,EU-B3) identified in Section D.2, adhesive application operations, chemical solvent usage, and the VPF line such that total source-wide VOC potential to emit is less than 250 tons per twelve (12) consecutive month period:

(a) The total VOC usage at the pourline facility identified as (EU-PL) and the VPF line shall be limited such that VOC emissions do not exceed 164.64 tons per twelve (12) consecutive month period. Emissions shall be calculated using the following:

(1) Emissions from TDI and MDI usage in the pourline facility (EU-PL) shall be equal to a 0.12 pounds VOC per hour emission rate;

(2) VOC emissions from amine catalyst usage in the pourline (EU-PL) and the VPF line shall be calculated using the following equations:

VOC emissions from pourline (EU-PL) (tons) =
Amine catalyst usage (gal) x density (lbs/gal) x tertiary amine % (weight) x 1 ton / 2000 lbs

VOC emissions from VPF line (tons) =
Amine catalyst usage (gal) x density (lbs/gal) x tertiary amine % (weight) x 1 ton / 2000 lbs x (1 - overall tertiary amine control efficiency of carbon adsorber on VPF line)

(A) The amine catalyst is comprised of volatile organics and non-volatile organics that are consumed in foam production process. Based on manufacturer's data, the volatile organic constituent of the amine catalyst is the tertiary amine. Therefore, VOC emissions from the amine catalyst shall be equivalent to the percent by weight of the tertiary amine constituent as shown above.

(3) VOC emissions from TDI and MDI usage in the VPF line shall be calculated using the following equation:

VOC emissions from VPF line (tons) =
TDI or MDI usage (lbs) x 0.0016% x 1 ton / 2000 lbs x (1 - overall VOC control efficiency of carbon adsorber on VPF line)
where:

TDI or MDI usage (lbs) = TDI or MDI containing pre-polymer usage (gal) x density (lbs/gal) x TDI or MDI % (weight)

(4) VOC emissions from the VPF line shall be calculated based on the use of a carbon adsorber with a minimum total VOC (including TDI, MDI, and tertiary amine VOC) overall control efficiency of 51%; and

(5) This source will limit the production of polyurethane foam in the VPF line to a maximum of 800,000,000 board feet per year.

(b) The VOC emissions from Flame Laminator #2 (EU-F2) shall be limited to less than 25.0 tons per year based on the following:

(1) This operating limit was based on a stack test emission factor of 6.5 lbs VOC per hour, and a foam burn-off range between 0.015 inches and 0.150 inches of foam. If the results of the stack testing required in this permit indicate a higher VOC emission rate, the limited hours of operation shall be adjusted accordingly to limit potential VOC emissions from EU-F2 to less than 25.0 tons per year.

(c) Flame Laminator #1 (EU-F1) emissions shall be based on a VOC emission rate of 6.5 pounds per hour. If the results of the stack testing required in this permit indicate a higher VOC emission rate, that rate shall be used to determine emissions from EU-F1.

(d) The VOC emissions from the four (4) rebond molding facilities (EU-R1, EU-R2, EU-R3, EU-R4) are based on a total emission factor of 0.14 lbs VOC/hr. This factor shall be used when calculating VOC emissions. If the results of the stack testing required in this permit indicate a higher VOC emission rate, that rate shall be used to determine emissions from the four (4) rebond molding facilities (EU-R1, EU-R2, EU-R3, EU-R4).

Compliance with these conditions shall limit source-wide VOC emissions to less than 250 tons per year and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Reason not incorporated: The flat block pourline and the two (2) flame laminators have since been removed from this source. Therefore, the potential to emit of source is now less than 250 tons per year for all regulated pollutants and the VOC emission limits to render 326 IAC 2-2 not applicable are no longer required.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit renewal application for the purposes of this review was received on February 11, 2003.

There was no notice of completeness letter mailed to the Permittee.

Emission Calculations

See Appendix A of this document for detailed emission calculations (7 pages).

Potential to Emit of the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

The source was issued a Part 70 Operating Permit on November 11, 1998. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential to Emit (tons/year)						
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Four (4) Rebond mold units (EU-R1, EU-R2, EU-R3, and EU-R4)	20.28	20.28	0.0	8.45	0.0	0.0	8.45
Adhesive Application and Cleaning Solvent Usage	0.0	0.0	0.0	8.94	0.0	0.0	4.12
Three (3) natural gas-fired industrial boilers (EU-B1, EU-B2, EU-B3)	0.26	1.05	0.08	0.76	11.59	13.80	0.26
VPF Line using TDI and amines	0.0	0.0	0.0	14.54	0.0	0.0	0.10
VPF Line using MDI and Methylene Chloride	0.0	0.0	0.0	0.02	0.0	0.0	223.68
Baumer Loop Slitters	0.0	0.0	0.0	3.49	0.0	0.0	0.01
Total PTE	20.54	21.33	0.08	36.20	11.59	13.80	236.62

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	No data
PM-10	20.53
SO_2	0.01
VOC	13.18
CO	8.02
NO_x	4.13
HAP (specify)	No data

County Attainment Status

The source is located in DeKalb County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) 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 emissions and NOx are considered when evaluating the rule applicability relating to ozone. DeKalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(b) DeKalb County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) This source does include a pollutant-specific emissions unit as defined in 40 CFR 64.1 for HAPs:

(1) with the potential to emit before controls equal to or greater than the major source threshold for methylene chloride, a HAP,
(2) that is subject to an emission limitation or standard for HAPs, and

(3) uses a control device as defined in 40CFR Part 64.1 to comply with that emission limitation or standard.

The VPF line at this Part 70 source has the potential to emit before controls of a single HAP of greater than 10 tons per year and of any combination of HAPs of greater than 25 tons per year and uses a control device (carbon adsorber) to comply with an emission limitation or standard. However, pursuant to 40 CFR 64.2(b)(i), since the VPF line is subject to an emission limitation or standard under section 112 of the Clean Air Act (40 CFR Part 63, Subpart III) that was promulgated after November 15, 1990, it is exempt from the requirements of 40 CFR Part 64, Compliance Assurance Monitoring.

(b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.

(c) The three (3) natural gas-fired boilers EU-B1, EU-B2, and EU-B3, are not subject to the requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60, Subpart D, Da, or Db), because each boiler has a maximum heat input capacity of less than 100 MMBtu per hour. The three (3) natural gas-fired boilers are not subject to the New Source Performance Standard, 326 IAC 12 (40 CFR 60, Subpart Dc) because they were each constructed prior to June 9, 1989. Boilers EU-B1 and EU-B2 were constructed in 1978 and boiler EU-B3 was constructed in 1986.

(d) The resin, amines, and fire retardant storage tanks classified as insignificant facilities are not subject to the New Source Performance Standards, 326 IAC 12 (40 CFR 60, Subpart K, Ka), because they do not store petroleum liquids. The New Source Performance Standards (40 CFR 60, Subparts K and Ka) only apply to those storage vessels that store petroleum liquids. The standards are therefore not applicable to the resin, amines, and fire retardant storage tanks.

(e) The process oil storage tanks, identified as T-30 and T-9, constructed in 1978, are not subject to the New Source Performance Standards, 326 IAC 12 (40 CFR 60, Subpart K, Ka) because each of these tanks has a storage capacity of less than 40,000 gallons.

(f) The process oil storage tank, identified as T-21, constructed in 1980, is not subject to the New Source Performance Standard, 326 IAC 12 (40 CFR 60, Subpart Ka) because the tank has a storage capacity of less than 40,000 gallons.

(g) The resin, amines, and fire retardant storage tanks and the volatile organic liquid storage tanks identified as T-30, T-9, and T-21, classified as insignificant facilities at this source are not subject to the New Source Performance Standard, 326 IAC 12 (40 CFR 60, Subpart Kb), because the tanks were constructed prior to July 23, 1984. The New Source Performance Standard (40 CFR 60, Subpart Kb), only applies to those tanks which for which construction, reconstruction, or modification is commenced after July 23, 1984.

The process oil storage tank, identified as T-33, the rebond binder tank, and the rebond binder scale tank, all constructed after July 23, 1984, are not subject to the New Source Performance Standard, 326 IAC 12 (40 CFR 60, Subpart Kb), because each of these tanks has a storage capacity of less than 40 cubic meters.

(h) The VPF line, the four (4) Rebond mold units (ID EU-R1, EU-R2, EU-R3, and EU-R4) and the TDI/MDI storage tanks (Insignificant Activities) are subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63.1290 through 63.1309, Subpart III, "National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production") because this source (1) Produces flexible polyurethane foam; (2) Emits a HAP; and (3) The foam manufacturing process is located at a plant site that is a major source, as defined in 40 CFR 63.2 of subpart A.

Since this source was constructed prior to the promulgation of this rule, it is an existing source pursuant to 40 CFR 63.2 for the purposes of this rule. When the VPF line was added to the source as permitted under Significant Source Modification No. 033-13706-00047, issued on June 25, 2001 and Significant Permit Modification No.: 033-14184-00047, issued on July 17, 2001; a cost analysis was performed to determine whether or not the addition of the VPF line to this source should be considered a reconstruction. It was determined that since the cost of the VPF line did not exceed 50% of the cost of the existing affected source, the addition of the VPF line did not constitute a reconstruction of the existing source, therefore, the VPF line was considered part of the existing source.

Pursuant to 40 CFR 63.1291(a), the VPF line, the four (4) Rebond mold units, and the TDI/MDI storage tanks were required to be in compliance with all provisions of this rule no later than October 8, 2001. The foam manufacturing process at this source is a slabstock polyurethane foam manufacturing operation.

Pursuant to 40 CFR 63.1293, the Permittee shall comply with 40 CFR 63.1294 and either 40 CFR 63.1293(a) or (b). The Permittee has chosen to comply with 40 CFR 63.1293(b). Pursuant to 40 CFR 63.1293(b), for sources that use no more than one (1) HAP as an auxiliary blowing agent (ABA) and an equipment cleaner, the source-wide emission limitation in 40 CFR 63.1299 applies.

Pursuant to 40 CFR 63.1294, the Permittee shall comply with the provisions of the section which are as follows:

(a) Diisocyanate storage vessels.
Diisocyanate storage vessels shall be equipped with either a system meeting the requirements in paragraph (a)(1) below, or a carbon adsorption system meeting the requirements of paragraph (a)(2) below.
(1) The storage vessel shall be equipped with a vapor return line from the storage vessel to the tank truck or rail car that is connected during unloading.

(i) During each unloading event, the vapor return line shall be inspected for leaks by visual, audible, or any other detection method.

(ii) When a leak is detected, it shall be repaired as soon as practicable, but not later than the subsequent unloading event.

(2) The storage vessel shall be equipped with a carbon adsorption system, meeting the monitoring requirements of 40 CFR 63.1303(a), that routes displaced vapors through activated carbon before being discharged to the atmosphere. The Permittee shall replace the existing carbon with fresh carbon upon indication of breakthrough before the next unloading event.

(b) Transfer pumps in diisocyanate service.

Each transfer pump in diisocyanate service shall meet the requirements of paragraph (b)(1) or (b)(2) below.

(1) The pump shall be a seal less pump; or

(2) The pump shall be a submerged pump system meeting the requirements in paragraphs (b)(2)(i) through (iii) listed below.

(i) The pump shall be completely immersed in bis(2-ethylhexyl)phthalate (DEHP, CAS #118-81-7), 2(methyloctyl)phthalate (DINP, CAS #68515-48-0), or another neutral oil.

(ii) The pump shall be visually monitored weekly to detect leaks,

(iii) When a leak is detected, it shall be repaired in accordance with the procedures in paragraphs (b)(2)(iii)(A) and (B) below, except as provided in paragraph (d) below.

(A) The leak shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected.

(B) A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. First attempts at repair include, but are not limited to, the following practices where practicable:

(1) Tightening of packing gland nuts.

(2) Ensuring that the seal flush is operating at design pressure and temperature.

(c) Other components in diisocyanate service.

If evidence of a leak is found by visual, audible, or any other detection method, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in paragraph (d) below. The first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

(d) Delay of repair.

(1) Delay of repair of equipment for which leaks have been detected is allowed for equipment that is isolated from the process and that does not remain in diisocyanate service.

(2) Delay of repair for valves and connectors is also allowed if:

(i) The owner or operator determines that diisocyanate emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair, and

(ii) The purged material is collected and destroyed or recovered in a control device when repair procedures are effected.

(3) Delay of repair for pumps is also allowed if repair requires replacing the existing seal design with a seal less pump, and repair is completed as soon as practicable, but not later than 6 months after the leak was detected.

Pursuant to 40 CFR 63.1299, the Permittee shall comply with the source-wide emission limitation option provided in 40 CFR 63.1293(b) and shall control HAP ABA storage and equipment leak emissions, HAP ABA emissions from the production line (which includes the VPF line), and equipment cleaning HAP emissions in accordance with the provisions in 40 CFR 63.1299. Compliance shall be determined on a rolling annual basis in accordance with 40 CFR 63.1299(a). As an alternative, the Permittee can determine compliance monthly, as described in 40 CFR 63.1299(b). The Permittee has chosen to comply with 63.1299 on a rolling annual basis in accordance with the procedures listed below. The Permittee has also chosen not to use a recovery device to comply with 40 CFR 63.1299.

(a) Rolling annual compliance.
Under the rolling annual compliance provisions, actual source-wide HAP ABA storage and equipment leak emissions, HAP ABA emissions from the production line, and equipment cleaning HAP emissions are compared to allowable source-wide emissions for each consecutive 12-month period. The allowable source-wide HAP emission level is calculated based on the production for the 12-month period, resulting in a potentially different allowable level for each 12-month period. While compliance is on an annual basis, compliance shall be determined monthly for the preceding 12-month period. The actual source-wide HAP emission level for a consecutive 12-month period shall be determined using the procedures in 40 CFR 63.1299(c)(1) through (4), listed in paragraphs (b)(1) through (4) below. The allowable HAP emission level for a consecutive 12-month period shall be determined using the procedures in 40 CFR 63.1299(d), listed in paragraph (c) below.

(b) Procedures for determining actual source-wide HAP emissions.
The actual source-wide HAP ABA storage and equipment leak emissions, HAP ABA emissions from the production line, and equipment cleaning HAP emissions shall be determined using the procedures in 40 CFR 63.1299. Actual source-wide HAP emissions for each individual month shall be determined using the procedures specified in paragraphs (b)(1) through (3) below.

(1) Actual source-wide HAP emissions for a month shall be determined using Equation 5 and the information determined in accordance with paragraphs (b)(2) and (3) below.

$$PWE_{actual} = \sum_{i}^{n} (ST_{i,\,begin} - ST_{i,\,end} + ADD_i) \qquad \text{(Equation 5)}$$

Where:

PWE_{actual} = Actual source-wide HAP ABA and equipment cleaning HAP emissions for a month, pounds/month.

n = Number of HAP ABA storage vessels.

$ST_{i,\,begin}$ = Amount of HAP ABA in storage vessel i at the beginning of the month, pounds, determined in accordance with the procedures listed in paragraph (b)(2) below.

$ST_{i,\,end}$ = Amount of HAP ABA in storage vessel i at the end of the month, pounds, determined in accordance with the procedures listed in paragraph (b)(2) below.

ADD_i = Amount of HAP ABA added to storage vessel i during the month, pounds, determined in accordance with the procedures listed in paragraph (b)(3) below.

(2) The amount of HAP ABA in a storage vessel shall be determined by monitoring the HAP ABA level in the storage vessel in accordance with 40 CFR 63.1303(d).

(3) The amount of HAP ABA added to a storage vessel for a given month shall be the sum of the amounts of all individual HAP ABA deliveries that occur during the month. The amount of each individual HAP ABA delivery shall be determined in accordance with 40 CFR 63.1303(e).

(4) Actual source-wide HAP emissions for each consecutive 12-month period shall be calculated as the sum of actual monthly source-wide HAP emissions for each of the individual 12 months in the period, calculated in accordance with paragraphs (b)(1) through (3) above.

(c) Allowable source-wide HAP emissions for a consecutive 12-month period shall be calculated as the sum of allowable monthly source-wide HAP emissions for each of the individual 12 months in the period. Allowable source-wide HAP emissions for each individual month shall be calculated using Equation 6.

$$\text{emiss}_{\text{allow, month}} = \sum_{j=1}^{m}\left(\sum_{i=1}^{n}\frac{(\text{limit}_i)(\text{polyol}_i)}{100}\right) j \qquad \text{(Equation 6)}$$

Where:

$\text{emiss}_{\text{allow, month}}$ = Allowable HAP ABA storage and equipment leak emissions, HAP ABA emissions from the production line, and equipment cleaning HAP emissions from the slabstock foam production source for the month, pounds.

m = Number of slabstock foam production lines.

polyol_i = Amount of polyol used in the month in the production of foam grade i on foam production line j, determined in accordance with 40 CFR 63.1303(b), pounds.

n = Number of foam grades produced in the month on foam production line j.

limit_i = HAP ABA formulation limit for foam grade i, parts HAP ABA per 100 parts polyol. The HAP ABA formulation limits are determined in accordance with 40 CFR 63.1297(d).

This source is not subject to the requirements of 40 CFR 63.1300 for molded flexible polyurethane foam production since there are no molded flexible polyurethane foam production processes at this source.

The requirements of 40 CFR 63.1301 apply to the four (4) Rebond mold units. Pursuant to 40 CFR 63.1301, the Permittee shall comply with the provisions in paragraphs (a) and (b) below.

(a) A HAP or HAP-based material shall not be used as an equipment cleaner at a rebond foam source.

(b) A HAP-based mold release agent shall not be used in a rebond foam source.

Pursuant to 40 CFR 63.1303, the Permittee shall comply with each applicable monitoring provision of 40 CFR 63.1303 as listed below.

(a) Monitoring requirements for storage vessel carbon adsorption systems.
The Permittee using a carbon adsorption system to meet the requirements of 40 CFR 63.1294(a) shall monitor the concentration level of the HAP or the organic compounds in the exhaust vent stream (or outlet stream exhaust) from the carbon adsorption system at the frequency specified in (a)(1) or (2) below in accordance with either (a)(3) or (4) below.

(1) The concentration level of HAP or organic compounds shall be monitored during each unloading event, or once per month during an unloading event if multiple unloading events occur in a month.

(2) As an alternative to monthly monitoring, the Permittee can set the monitoring frequency at an interval no greater than 20 percent of the carbon replacement interval, which is established using a design analysis described below in paragraphs (a)(2)(i) through (iii).
  (i) The design analysis shall consider the vent stream composition, constituent concentration, flow rate, relative humidity, and temperature.
  (ii) The design analysis shall establish the outlet organic concentration level, the capacity of the carbon bed, and the working capacity of activated carbon used for the carbon bed, and
  (iii) The design analysis shall establish the carbon replacement interval based on the total carbon working capacity of the carbon adsorption system and the schedule for filling the storage vessel.

(3) Measurements of HAP concentration shall be made using 40 CFR part 60, appendix A, Method 18. The measurement shall be conducted over at least one 5-minute interval during which the storage vessel is being filled.

(4) Measurements of organic compounds shall be made using 40 CFR part 60, Appendix A, Method 25A. The measurement shall be conducted over at least one 5-minute interval during which the storage vessel is being filled.

(b) Monitoring for HAP ABA and polyol added to the foam production line (which includes the VPF line) at the mixhead.

(1) The Permittee shall comply with the provisions in paragraph (b)(1)(i) below.
  (i) The Permittee shall continuously monitor the amount of polyol added at the mixhead when foam is being poured, in accordance with paragraphs (b)(2) through (4) below.

(2) The owner or operator shall monitor either:
  (i) Pump revolutions; or
  (ii) Flow rate.

(3) The device used to monitor the parameter from paragraph (b)(2) shall have an accuracy to within +/- 2.0 percent of the HAP ABA being measured, and shall be calibrated initially, and periodically, in accordance with paragraph (b)(3)(i) or (ii) below.
  (i) For polyol pumps, the device shall be calibrated at least once each 6 months.
  (ii) For HAP ABA pumps, the device shall be calibrated at least once each month.

(4) Measurements must be recorded at the beginning and end of the production of each grade of foam within a run of foam.

(c) Monitoring of HAP ABA in a storage vessel.

The amount of HAP ABA in a storage vessel shall be determined weekly by monitoring the HAP ABA level in the storage vessel using a level measurement device that meets the criteria described in paragraphs (c)(1) and either (c)(2) or (c)(3) below.

(1) The level measurement device must be calibrated initially and at least once per year thereafter.

(2) With the exception of visually-read level measurement devices (i.e., gauge glass), the device must have either a digital or printed output.

(3) If the level measurement device is a visually-read device, the device must be equipped with permanent graduated markings to indicate HAP ABA level in the storage tank.

(d) Monitoring of HAP ABA added to a storage vessel.
The amount of HAP ABA added to a storage vessel during a delivery shall be determined in accordance with either paragraphs (d)(1), (2), or (3) of this section.

(1) The volume of HAP ABA added to the storage vessel shall be determined by recording the volume in the storage vessel prior to the delivery and the volume after the delivery, provided that the storage tank level measurement device used to determine the levels meets the criteria in paragraph (c) above.

(2) The volume of HAP ABA added to the storage vessel shall be determined by monitoring the flow rate using a device with an accuracy of +/- 2.0 percent, and calibrated initially and at least once each six months thereafter.

(3) The weight of HAP ABA added to the storage vessel shall be calculated as the difference of the full weight of the transfer vehicle prior to unloading into the storage vessel and the empty weight of the transfer vehicle after unloading into the storage vessel. The weight shall be determined using a scale meeting the requirements of either paragraph (d)(3)(i) or (ii) below.

(i) A scale approved by the State or local agencies using the procedures contained in Handbook 44, Specifications, Tolerances, and Other Technical Requirements for Weighing and Measuring Devices 1998 (incorporation by reference--see 40 CFR 63.14).

(ii) A scale determined to be in compliance with the requirements of the National Institute of Standards and Technology Handbook 44 at least once per year by a registered scale technician.

Pursuant to 40 CFR 63.1304, the Permittee shall use the test methods listed below, as applicable, to demonstrate compliance with this subpart.

(a) Test method to determine foam properties.
The IFD and density of each grade of foam produced during each run of foam shall be determined using ASTM D3574-91, Standard Test Methods for Flexible Cellular Materials--Slab, Bonded, and Molded (incorporation by reference--see 40 CFR 63.14), using a sample of foam cut from the center of the foam bun. The maximum sample size for which the IFD and density is determined shall not be larger than 24 inches by 24 inches by 4 inches. For grades of foam where the Permittee has designated the HAP ABA formulation limitation as zero, the Permittee is not required to determine the IFD and density in accordance with this paragraph.

Pursuant to 40 CFR 63.1306, the Permittee shall comply with each applicable reporting provision in this section. The required Precompliance report for this source was received by IDEM on October 10, 2000.

(a) Initial notification.
The Permittee shall submit an initial notification in accordance with 40 CFR 63.9(b).

(b) Application for approval of construction or reconstruction.
The Permittee shall submit an application for approval of construction or reconstruction in accordance with the provisions of 40 CFR 63.5(d).

(c) Precompliance report.
The Permittee shall submit a precompliance report no later than 12 months before the compliance date. This report shall contain the information listed in paragraphs (c)(1) through (c)(8) below, as applicable.

(1) Whether the source will comply with the emission point specific limitations described in 40 CFR 63.1293(a), or with the source-wide emission limitation described in 40 CFR 63.1293(b).

(2) For a source complying with the emission point specific limitations, whether the source will comply on a rolling annual basis in accordance with 40 CFR 63.1297(b), or will comply with the monthly alternative for compliance contained in 40 CFR 63.1297(c).

(3) For a source complying with the source-wide emission limitation, whether the source will comply on a rolling annual basis in accordance with 40 CFR 63.1299(a), or will comply with the monthly alternative for compliance contained in 40 CFR 63.1299(b).

(4) A description of how HAP ABA and/or polyol added at the mixhead will be monitored. If the owner or operator is developing an alternative monitoring program, the alternative monitoring program containing the information in 40 CFR 63.1303(b)(5)(i) through (iv) shall be submitted.

(5) Notification of the intent to use a recovery device to comply with the provisions of 40 CFR 63.1297 or 40 CFR 63.1299.

(6) For slabstock affected sources complying with 40 CFR 63.1297 or 40 CFR 63.1299 using a recovery device, the continuous recovered HAP ABA monitoring and record keeping program, developed in accordance with 40 CFR 63.1303(c).

(7) For sources complying with the source-wide emission limitation, a description of how the amount of HAP ABA in a storage vessel shall be determined.

(8) For sources complying with the source-wide emission limitation, a description of how the amount of HAP ABA added to a storage vessel during a delivery will be monitored. If the owner or operator is developing an alternative monitoring program, the alternative monitoring program containing the information in 40 CFR 63.1303(e)(4)(i) through (iv) shall be submitted.

(9) If the Administrator does not notify the owner or operator of objections to an alternative monitoring program submitted in accordance with (c)(4) or (c)(6) above, or a recovered HAP ABA monitoring and record keeping program submitted in accordance with (c)(7) above, the program shall be deemed approved 45 days after its receipt by the Administrator.

(d) Notification of compliance status.

The Permittee shall submit a notification of compliance status report no later than 180 days after the compliance date. For slabstock affected sources, this report shall contain the information listed in paragraphs (d)(1) and (2) below, as applicable. This report shall contain the information listed in paragraph (d)(3) for rebond foam processes.

(1) A list of diisocyanate storage vessels, along with a record of the type of control utilized for each storage vessel.

(2) For transfer pumps in diisocyanate service, a record of the type of control utilized for each transfer pump.

(3) A statement that the rebond foam affected source is in compliance with 40 CFR 63.1301, or that rebond processes at an affected source are in compliance with 40 CFR 63.1301.

(e) Semiannual reports.

The Permittee shall submit a report containing the information specified in paragraphs (e)(1) through (4) below semiannually no later than 60 days after the end of each 180 day period. The first report shall be submitted no later than 240 days after the date that the Notification of Compliance Status is due and shall cover the 6-month period beginning on the date that the Notification of Compliance Status Report is due.

(1) For slabstock affected sources complying with the rolling annual compliance provisions of 40 CFR 63.1299, the allowable and actual HAP ABA emissions (or allowable and actual source-wide HAP emissions) for each of the 12-month periods ending on each of the six months in the reporting period. This information is not required to be included in the initial semi-annual compliance report.

(2) For sources complying with the storage vessel provisions of 40 CFR 63.1294(a) using a carbon adsorption system, unloading events that occurred after breakthrough was detected and before the carbon was replaced.

(3) Any equipment leaks that were not repaired in accordance with 40 CFR 63.1294(b)(2)(iii) and 40 CFR 63.1294(c).

(4) Any leaks in vapor return lines that were not repaired in accordance with 40 CFR 63.1294(a)(1)(ii).

(f) Other reports.

(1) Change in selected emission limitation.
The Permittee electing to change their slabstock flexible polyurethane foam emission limitation (from emission point specific limitations to a source-wide emission limitation, or vice versa), selected in accordance with 40 CFR 63.1293, shall notify the Administrator no later than 180 days prior to the change.

(2) Change in selected compliance method.
The Permittee changing the period of compliance for 40 CFR 63.1299 (between rolling annual and monthly) shall notify the Administrator no later than 180 days prior to the change.

(g) Annual compliance certifications.
The Permittee subject to the provisions in 40 CFR 63.1293 through 63.1301 shall submit a compliance certification annually.

(1) The compliance certification shall be based on information consistent with that contained in 40 CFR 63.1308 of this section, as applicable.

(2) A compliance certification required pursuant to a State or local operating permit program may be used to satisfy the requirements of this section, provided that the compliance certification is based on information consistent with that contained in 40 CFR 63.1308 of this section, and provided that the Administrator has approved the State or local operating permit program under part 70 of this chapter.

(3) Each compliance certification submitted pursuant to this section shall be signed by a responsible official of the company that owns or operates the affected source.

Pursuant to 40 CFR 63.1307, the applicable records designated in paragraphs (a) through (c) below shall be maintained by the Permittee.

(a) Storage vessel records.

(1) A list of diisocyanate storage vessels, along with a record of the type of control utilized for each storage vessel.

(2) For storage vessels complying through the use of a carbon adsorption system, the records listed in paragraphs (a)(2)(i) or (ii), and paragraph (a)(2)(iii) of this section.

(i) Records of dates and times when the carbon adsorption system is monitored for carbon breakthrough and the monitoring device reading, when the device is monitored in accordance with 40 CFR 63.1303(a); or

(ii) For affected sources monitoring at an interval no greater than 20 percent of the carbon replacement interval, in accordance with 40 CFR 63.1303(a)(2), the records listed in paragraphs (a)(2)(ii)(A) and (B) below.

(A) Records of the design analysis, including all the information listed in 40 CFR 63.1303(a)(2)(i) through (iii), and

(B) Records of dates and times when the carbon adsorption system is monitored for carbon breakthrough and the monitoring device reading.

(iii) Date when the existing carbon in the carbon adsorption system is replaced with fresh carbon.

(3) For storage vessels complying through the use of a vapor return line, paragraphs (a)(3)(i) through (iii) below.

(i) Dates and times when each unloading event occurs and each inspection of the vapor return line for leaks occurs.

(ii) Records of dates and times when a leak is detected in the vapor return line.

(iii) Records of dates and times when a leak is repaired.

(b) Equipment leak records.

(1) A list of components as specified below in paragraph (b)(1)(i).

(i) For all affected sources, a list of components in diisocyanate service,

(2) For transfer pumps in diisocyanate service, a record of the type of control utilized for each transfer pump and the date of installation.

(3) When a leak is detected as specified in 40 CFR 63.1294(b)(2)(ii) and 40 CFR 63.1294(c), the requirements listed in paragraphs (b)(3)(i) and (ii) below apply:

(i) Leaking equipment shall be identified in accordance with the requirements in paragraphs (b)(3)(i)(A) and (B) below.

(A) A readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment.

(B) The identification on equipment, other than a valve, may be removed after it has been repaired.

(ii) The information in paragraphs (b)(3)(ii)(A) through (H) shall be recorded for leaking components.

(A) The instrument and operator identification numbers and the equipment identification number.

(B) The date the leak was detected and the dates of each attempt to repair the leak.

(C) Repair methods applied in each attempt to repair the leak.

(D) The words “above leak definition" if the maximum instrument reading measured by the methods specified in 40 CFR 63.1304(a) after each repair attempt is equal or greater than the leak definitions for the specified equipment.

(E) The words “repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.

(F) The expected date of the successful repair of the leak if a leak is not repaired within 15 calendar days.

(G) The date of successful repair of the leak.

(H) The date the identification is removed.

(c) HAP ABA records.

(1) Source-wide limitations - rolling annual compliance and monthly compliance alternative records.

The Permittee complying with the source-wide limitations of 40 CFR 63.1299, and the rolling annual compliance provisions in 40 CFR 63.1299(a), shall maintain the records listed in paragraphs (c)(1)(i) through (c)(1)(vii) below.

(i) Daily records of the information listed in paragraphs (c)(1)(i)(A) through (C) of this section.

(A) A log of foam runs each day. For each run, the log shall include a list of the grades produced during the run.

(B) Results of the density and IFD testing for each grade of foam produced during each run of foam, conducted in accordance with the procedures in 40 CFR 63.1304(b). The results of this testing shall be recorded within 10 working days of the production of the foam. For grades of foam where the Permittee has designated the HAP ABA formulation limitation as zero, the Permittee is not required to keep records of the IFD and density.

(C) With the exception of those grades for which the Permittee has designated zero as the HAP ABA formulation limitation, the amount of polyol added to the slabstock foam production line at the mixhead for each grade produced during each run of foam, determined in accordance with 40 CFR 63.1303(b).

(ii) For sources complying with the source-wide emission limitation, weekly records of the storage tank level, determined in accordance with 40 CFR 63.1303(d).

(iii) Monthly records of the information listed below in paragraphs (c)(1)(iii)(A) through (E).

(A) A listing of all foam grades produced during the month,

(B) For each foam grade produced, the residual HAP formulation limitation, calculated in accordance with 40 CFR 63.1297(d).

(C) With the exception of those grades for which the Permittee has designated zero as the HAP ABA formulation limitation, the total amount of polyol used in the month for each foam grade produced.

(D) The total allowable HAP ABA and equipment cleaning emissions for the month, determined in accordance with 40 CFR 63.1297(b)(2).

(E) The total actual source-wide HAP ABA emissions for the month, determined in accordance with 40 CFR 63.1299(c)(1), along with the information listed in paragraphs (c)(1)(iii)(E)(1) and (2) below.

(1) The amounts of HAP ABA in the storage vessel at the beginning and end of the month, determined in accordance with 40 CFR 63.1299(c)(2); and

(2) The amount of each delivery of HAP ABA to the storage vessel, determined in accordance with 40 CFR 63.1299(c)(3).

(iv) Each source complying with the rolling annual compliance provisions of 40 CFR 63.1299(a) shall maintain the records listed in paragraphs (c)(1)(iv)(A) and (B) below.

(A) The sum of the total allowable HAP ABA and equipment cleaning HAP emissions for the month and the previous 11 months.

(B) The sum of the total actual HAP ABA and equipment cleaning HAP emissions for the month and the previous 11 months.

(v) Records of all calibrations for each device used to measure polyol added at the mixhead, conducted in accordance with 40 CFR 63.1303(b)(3).

(vi) Records of all calibrations for each device used to measure the amount of HAP ABA in the storage vessel, conducted in accordance with 40 CFR 63.1303(d)(1).

(vii) Records to verify that all scales used to measure the amount of HAP ABA added to the storage vessel meet the requirements of 40 CFR 63.1303(e)(3). For scales meeting the criteria of 40 CFR 63.1303(e)(3)(i), this documentation shall be in the form of written confirmation of the State or local approval. For scales complying with 40 CFR 63.1303(e)(3)(ii), this documentation shall be in the form of a report provided by the registered scale technician.

(d) The Permittee following the compliance methods in 40 CFR 63.1308(b)(1) and (c)(1) shall maintain records of each use of a vapor return line during unloading, of any leaks detected during unloading, and of repairs of leaks detected during unloading.

(e) The Permittee subject to 40 CFR 63.1300 or 40 CFR 63.1301 of this subpart shall maintain a product data sheet for each compound other than diisocyanates used to flush the mixhead and associated piping during periods of startup or maintenance, which includes the HAP content, in kg of HAP/kg solids (lb HAP/lb solids), of each solvent other than diisocyanates used to flush the mixhead and associated piping during periods of startup or maintenance.

(f) The Permittee subject to 40 CFR 63.1300 or Sec. 63.1301 of this subpart shall maintain a product data sheet for each mold release agent used that includes the HAP content, in kg of HAP/kg solids (lb HAP/lb solids), of each mold release agent.

Pursuant to 40 CFR 63.1308,

(a) For the Permittee, compliance with the requirements listed in paragraphs (a)(1) through (a)(2) below shall mean compliance with the requirements contained in 40 CFR 63.1293 through 63.1301, absent any credible evidence to the contrary.

(1) The requirements described in Tables 3, 4, and 5 of Subpart III; and

(2) The requirement to submit a compliance certification annually as required under 40 CFR 63.1306(g).

(b) All slabstock affected sources.

For slabstock affected sources, failure to meet the requirements contained in 40 CFR 63.1294 shall be considered a violation of this subpart. Violation of each item listed in the paragraphs (b)(1) through (b)(6) below, as applicable, shall be considered a separate violation.

(1) For the Permittee complying with 40 CFR 63.1294(a) in accordance with 40 CFR 63.1294(a)(1), each unloading event that occurs when the diisocyanate storage vessel is not equipped with a vapor return line from the storage vessel to the tank truck or rail car, each unloading event that occurs when the vapor line is not connected, each unloading event that the vapor line is not inspected for leaks as described in 40 CFR 63.1294(a)(1)(i), each unloading event that occurs after a leak has been detected and not repaired, and each calendar day after a leak is detected, but not repaired as soon as practicable;

(2) For the Permittee complying with 40 CFR 63.1294(a) in accordance with 40 CFR 63.1294(a)(2), each unloading event that the diisocyanate storage vessel is not equipped with a carbon adsorption system, each unloading event (or each month if more than one unloading event occurs in a month) that the carbon adsorption system is not monitored for breakthrough in accordance with 40 CFR 63.1303(a)(3) or (4), and each unloading event that occurs when the carbon is not replaced after an indication of breakthrough;

(3) For the Permittee complying with 40 CFR 63.1294(a) in accordance with 40 CFR 63.1294(a)(2) through the alternative monitoring procedures in 40 CFR 63.1303(a)(2), each unloading event that the diisocyanate storage vessel is not equipped with a carbon adsorption system, each time that the carbon adsorption system is not monitored for breakthrough in accordance with 40 CFR 63.1303(a)(3) or (4) at the interval established in the design analysis, and each unloading event that occurs when the carbon is not replaced after an indication of breakthrough;

(4) For the Permittee complying with 40 CFR 63.1294(b) in accordance with 40 CFR 63.1294(b)(1), each calendar day that a transfer pump in diisocyanate service is not a seal less pump;

(5) For the Permittee complying with 40 CFR 63.1294(b) in accordance with 40 CFR 63.1294(b)(2), each calendar day that a transfer pump in diisocyanate service is not submerged as described in 40 CFR 63.1294(b)(2)(i), each week that the pump is not visually monitored for leaks, each calendar day after 5 calendar days after detection of a leak that a first attempt at repair has not been made in accordance with 40 CFR 63.1294(b)(2)(iii)(B), and the earlier of each calendar day after 15 calendar days after detection of a leak that a leak is not repaired, or a leak is not repaired as soon as practicable, each subsequent calendar day (with the exception of situations meeting the criteria of 40 CFR 63.1294(d));

(6) For each affected source complying with 40 CFR 63.1294(c), each calendar day after 5 calendar days after detection of a leak that a first attempt at repair has not been made, and the earlier of each calendar day after 15 calendar days after detection of a leak that a leak is not repaired, or if a leak is not repaired as soon as practicable, each subsequent calendar day (with the exception of situations meeting the criteria of 40 CFR 63.1296(f)).

(c) Slabstock affected sources complying with the source-wide emission limitation. For the Permittee complying with the source-wide emission limitation as provided in 40 CFR 63.1293(b), failure to meet the requirements contained in 40 CFR 63.1299 shall be considered a violation of this subpart. Violation of each item listed in paragraph (c)(1) below, as applicable, shall be considered a separate violation.

(1) For each affected source complying with 40 CFR 63.1299 in accordance with the rolling annual compliance option in 40 CFR 63.1299(a), each calendar day in the 12-month period for which the actual HAP ABA emissions exceeded the allowable HAP ABA emissions level, each calendar day in which foam is being poured where the amount of polyol added at the mixhead is not monitored (as required) in accordance with 40 CFR 63.1303(b)(1)(i), each calendar day in a week in which the amount of HAP ABA in a storage vessel is not determined in accordance with 40 CFR 63.1303(d), each delivery of HAP ABA in which the amount of HAP ABA added to the storage vessel is not determined in accordance with 40 CFR 63.1303(e), each calendar day in a 6-month period in which the polyol pumps are not calibrated in accordance with 40 CFR 63.1303(b)(3)(i), and each calendar day after 10 working days after production where the IFD and density of a foam grade are not determined (where required) in accordance with 40 CFR 63.1304(b);

(d) Molded and rebond foam affected sources.
For the Permittee, a rebond foam affected source, failure to meet the requirements contained in 40 CFR 63.1301 shall be considered a violation of this subpart. Violation of each item listed in the following paragraphs shall be considered a separate violation.

(1) For each rebond foam affected source subject to the provisions of 40 CFR 63.1301(a), each calendar day that a HAP-based material is used as an equipment cleaner; and

(2) For each rebond foam affected source complying with 40 CFR 63.1301(b), each calendar day that a HAP-based mold release agent is used.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart III.

(i) The degreasing operation, an insignificant activity, is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR 63.460 through 63.468, Subpart T), because this unit does not use a halogenated HAP cleaning solvent.

(j) The three (3) natural gas fired boilers (ID Nos. EU-B1, EU-B2, and EU-B3), each rated at 10.5 million (MM) British thermal units (Btu) per hour are subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 326 IAC 14, 40 CFR 63.7480 through 63.7575, Subpart DDDDD. The three (3) boilers, EU-B1, EU-B2, and EU-B3, comprise one existing affected source for the large gaseous fuel subcategory, as defined by 40 CFR 63.7506(b), because they meet the criteria in the definition in 40 CFR 63.7575 for the large gaseous fuel subcategory. The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source after the effective date of 40 CFR 63, Subpart DDDDD, except when otherwise specified in 40 CFR 63 Subpart DDDDD. This rule is not yet published in the *Federal Register*. A copy of the signed, final rule is available at http://www.epa.gov/ttn/atw/boiler/boilerpg.html.

Pursuant to 40 CFR 63.7506(b), the only requirements that apply to the existing affected source for the large gaseous fuel subcategory are the initial notification requirements in 40 CFR 63.9(b). The Permittee shall submit an Initial Notification containing the information specified in 40 CFR 63.9(b)(2) not later than 120 days after the effective date of 40 CFR 63, Subpart DDDDD as required by 40 CFR 63.7545(b).

(k) This source is not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63.8780 through 63.8830, Subpart MMMMM, Flexible Polyurethane Foam Fabrication Operations) because, although it operates two loop slitters, they are not a loop slitter affected source because the adhesive that is used does not meet the definition of a HAP-based adhesive under 40 CFR 63.8830. Pursuant to the definition of HAP-based adhesive under 40 CFR 63.8830, it is an adhesive that contains 5% by weight or more of a HAP. The n-propyl bromide based adhesive that is used in the Baumer loop slitters at this source contains less than 1% of any HAP. Therefore, since the loop slitters are not a loop slitter affected source, as defined at 40 CFR 63.8784(b)(1), they are not subject to this rule.

(l) The Permittee submitted a Part 1 MACT Application indicating that the source may be subject to the requirements of Section 112(j) of the Clean Air Act on May 15, 2002. The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are no longer applicable because the EPA finalized rules on February 26, 2004 for the remaining source category that Foamex, L.P. indicated might be applicable in their Part 1 MACT Application. Pursuant to 40 CFR 63.50(c), since final standards have been promulgated for Foamex, L.P.'s source category, the source category is no longer affected by Section 112(j) Maximum Achievable Control Technology (MACT) Hammer. IDEM has evaluated the final standards to determine if the final standards are applicable and has explained the determination if the standards are applicable within this technical support document (See discussion of applicability of 40 CFR 63, Subpart DDDDD, above).

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source, which is not one of the 28 listed source categories, is not subject to the requirements of this rule because the potential to emit of all regulated criteria pollutants are less than 250 tons per year.

When this source was initially constructed in 1977, the potential VOC emissions were greater than 250 tons per year. However, the source was not permitted until the initial Part 70 permit (T033-7625-00047) was issued on November 11, 1998. Since actual VOC emissions were less than 250 tons per year, the source accepted a federally enforceable source-wide VOC emissions limit of less than 250 tons per year so that the requirements of this rule did not apply. Pursuant to Significant Source Modification No. 033-13706-00047, issued on June 25, 2001, and Significant Permit Modification No. 033-14184-00047, issued on July 17, 2001, this limit was revised to include the VPF line also. All modifications to this source since issuance of the initial Part 70 permit were minor modifications to an existing minor PSD source.

The flat block pourline and the two (2) flame laminators have since been removed from this source. Therefore, the unrestricted potential to emit of source is now less than 250 tons per year for all regulated pollutants and the VOC emission limits to render 326 IAC 2-2 not applicable are no longer required.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2004 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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 the 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.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). This source is subject to the requirements of the NESHAP, 326 IAC 14, (40 CFR Part 63.1290 through 63.1309, Subpart III, "National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production", therefore, the requirements of this rule do not apply.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is subject to the requirements of 326 IAC 8-6-1. Pursuant to 326 IAC 8-6-1, this rule applies to existing sources as of January 1, 1980, located in Lake and Marion Counties, and sources commencing operation after October 7, 1974, and prior to January 1, 1980, located anywhere in the state with potential VOC emissions greater than 100 tons per year, not limited by other rules in Article 8. This source, located in DeKalb County, was constructed in 1977 and commenced operation after October 7, 1974 and prior to January 1, 1980 and has potential VOC emissions of greater than 100 tons per year. However, the rule only applies to emissions of organic solvents which are VOC and which are liquids at standard conditions, and include diluents which are used as dissolvers, viscosity reducers, carrying agents, and cleaning agents. Pursuant to 326 IAC 8-6-2(a), the Permittee shall not cause the emission of more than 100 tons per year of VOC unless all VOC emitted from such source are reduced by at least 85% from emissions which would occur before the application of any control equipment or process.

This source uses organic solvent in the source-wide chemical cleaning solvent usage operation. All other VOC emissions are from the raw materials used in the foam manufacturing process, including adhesives and blowing agents, and are not regulated under this rule. Additionally, the VPF line is subject to the requirements of 326 IAC 8-1-6 (New Facilities, General Reduction Requirements). The potential VOC emissions from the cleaning solvent usage operation are 8.94 tons per year, which is less than 100 tons per year; therefore, this source is in compliance with the requirements under 326 IAC 8-6-2(a) of this rule.

State Rule Applicability – Individual Facilities

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

(a) The requirements of 326 IAC 6-2-3 apply to indirect heating facilities constructed prior to September 21, 1983. Pursuant to 326 IAC 6-2-3 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(b)), particulate matter emissions from Boiler #1 (EU-B1) and Boiler #2 (EU-B2), each rated at 10.5 mmBtu per hour and constructed in 1978, shall be limited by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}} = 1.03 \text{ lb/MMBtu}$$

where: Pt = Pounds of PM emitted per MMBtu heat input.
C = 50 ug/m^3 (maximum ground level conc.)
a = plume rise factor = 0.67
h = 27.5 ft.
Q = Total source maximum operating capacity rating of indirect heating facilities in MMBtu per hour.
= 21.0 MMBtu/hr
N = Number of stacks in fuel burning operation = 2

However, pursuant to 326 IAC 6-2-3(e), particulate matter emissions from any facility used for indirect heating purposes which has 250 MMBtu per hour heat input or less and which began operation after June 8, 1972, shall in no case exceed 0.6 pound per MMBtu heat input. Therefore, since this is the most stringent limit, particulate matter emissions from each of Boiler #1 and Boiler #2 shall not exceed 0.6 pound per MMBtu heat input. Potential PM emissions from each of these facilities is less than 0.6 pound per MMBtu heat input, therefore, these facilities will comply with 326 IAC 6-2-3.

(b) The requirements of 326 IAC 6-2-4 apply to indirect heating facilities constructed after September 1, 1983. Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(c)), particulate matter emissions from Boiler #3 rated at 10.5 MMBtu per hour and constructed in 1986, shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = Pounds of particulate matter emitted per MMBtu heat input.
Q = Total source maximum operating capacity rating of indirect heating facilities in MMBtu per hour.
Q = 21.0 MMBtu/hr (from Boilers #1 and #3) + 10.5 MMBtu/hr = 31.5 MMBtu/hr

$$Pt = \frac{1.09}{(31.5)^{0.26}} = 0.44 \text{ pound per MMBtu heat input.}$$

Potential particulate matter emissions from the 10.5 MMBtu per hour Boiler #3 are less than 0.44 pounds per MMBtu, therefore, this unit is in compliance with this rule.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

(a) The particulate from the rebond molding facilities (EU-R1, EU-R2, EU-R3, EU-R4) shall not exceed 18.66 pounds per hour when operating at a process weight rate of 9.6 tons per hour based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (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

The four (4) rebond molding facilities have total potential PM emissions of 4.63 pounds per hour, therefore, these units are in compliance with this rule.

(b) 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. This limitation applies to the following insignificant activities:

(1) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

This rule applies to new facilities, constructed after January 1, 1980, with potential VOC emissions greater than 25 tons per year. Since potential VOC emissions from the VPF line before control are greater than 25 tons per year, the VPF line is subject to this rule. Pursuant to the First Significant Source Modification (033-13706-00047), issued on June 25, 2001, and later as revised in the Second Significant Source Modification (033-15727-00047), issued on November 26, 2003, BACT for the VPF line was determined to be the following:

(1) Operation of the carbon adsorber to control total VOC emissions from the VPF line at all times that the VPF line is in operation. The carbon adsorber shall operate at a minimum total VOC (including TDI, MDI, and tertiary amine VOC) overall control efficiency of 51%.

(2) The production of polyurethane foam in the VPF line shall be limited to a maximum of 800,000,000 board feet per year. This production limit will limit the usage of tertiary amines and TDI such that the emissions of VOC will be limited to 14.6 tons per year after control by the carbon adsorber.

Note: The use of the carbon adsorber combined with the production limit is equivalent to an 86.7% reduction of total VOC emissions.

Potential VOC emissions from each of the source-wide adhesive application operation and the source-wide chemical cleaning solvent usage operation are less than 25 tons per year, therefore, these operations are not subject to this rule.

Potential VOC emissions from the four (4) rebond mold units are less than 25 tons per year, therefore, these units are not subject to this rule.

326 IAC 8-3-2 (Cold Cleaner Operations)

The Safety-Kleen parts washer is subject to this rule because it is a cold cleaning operation that was constructed after January 1, 1980. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

Pursuant to 326 IAC 8-3-1(b)(2), 326 IAC 8-3-5 only applies to cold cleaner degreasers without a remote solvent reservoir. Since this degreaser does have a remote solvent reservoir, it is not subject to the requirements of 326 IAC 8-3-5.

Testing Requirements

All testing requirements from previous approvals were incorporated into the Part 70 permit. The testing requirements for those units removed from the source were not incorporated.

Pursuant to 40 CFR 63.1304, the Permittee shall use the test methods listed below, as applicable, to demonstrate compliance with Subpart III.

(a) Test method to determine foam properties.
The IFD and density of each grade of foam produced during each run of foam shall be determined using ASTM D3574-91, Standard Test Methods for Flexible Cellular Materials--Slab, Bonded, and Molded (incorporation by reference--see 40 CFR 63.14), using a sample of foam cut from the center of the foam bun. The maximum sample size for which the IFD and density is determined shall not be larger than 24 inches by 24 inches by 4 inches. For grades of foam where the Permittee has designated the HAP ABA formulation limitation as zero, the Permittee is not required to determine the IFD and density in accordance with this paragraph.

PM, opacity, and VOC testing was performed on the four (4) rebond mold units on January 9, 10, 11, and 17, 2002.

The following repeat testing requirements apply to the four (4) rebond molding units (EU-R1, EU-R2, EU-R3, and EU-R4) which are to be conducted five (5) years from the date of the last compliance demonstration:

(a) During the period between January, 2007 and June, 2007, the Permittee shall perform VOC testing on the four (4) rebond molding units (EU-R1, EU-R2, EU-R3, EU-R4), to confirm the VOC emissions, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

(b) During the period between January, 2007 and June, 2007, the Permittee shall perform PM testing on the four (4) rebond molding units (EU-R1, EU-R2, EU-R3, EU-R4) to demonstrate compliance with the PM limits pursuant to 326 IAC 6-3-2, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

VOC testing was performed on the VPF line on May 20 – 22, 2002.

The following testing requirement applies to the VPF line:

(a) In order to demonstrate compliance with the 326 IAC 8-1-6 (BACT) requirements for the VPF line included in Condition D.1.7 of the Part 70 permit, the Permittee shall perform VOC testing by no later than May, 2007, on the carbon adsorber controlling VOC emissions from the VPF line utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the approporiate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The four (4) rebond mold units and the VPF unit have applicable compliance monitoring conditions as specified below:

   Pursuant to 40 CFR 63.1303, the Permittee shall comply with each applicable monitoring provision of 40 CFR 63.1303 as listed below.

   (a) Monitoring requirements for storage vessel carbon adsorption systems.
   The Permittee using a carbon adsorption system to meet the requirements of 40 CFR 63.1294(a) shall monitor the concentration level of the HAP or the organic compounds in the exhaust vent stream (or outlet stream exhaust) from the carbon adsorption system at the frequency specified in (a)(1) or (2) below in accordance with either (a)(3) or (4) below.

   (1) The concentration level of HAP or organic compounds shall be monitored during each unloading event, or once per month during an unloading event if multiple unloading events occur in a month.

   (2) As an alternative to monthly monitoring, the Permittee can set the monitoring frequency at an interval no greater than 20 percent of the carbon replacement interval, which is established using a design analysis described below in paragraphs (a)(2)(i) through (iii).

   (i) The design analysis shall consider the vent stream composition, constituent concentration, flow rate, relative humidity, and temperature.

   (ii) The design analysis shall establish the outlet organic concentration level, the capacity of the carbon bed, and the working capacity of activated carbon used for the carbon bed, and

   (iii) The design analysis shall establish the carbon replacement interval based on the total carbon working capacity of the carbon adsorption system and the schedule for filling the storage vessel.

   (3) Measurements of HAP concentration shall be made using 40 CFR Part 60, appendix A, Method 18. The measurement shall be conducted over at least one 5-minute interval during which the storage vessel is being filled.

(4) Measurements of organic compounds shall be made using 40 CFR Part 60, Appendix A, Method 25A. The measurement shall be conducted over at least one 5-minute interval during which the storage vessel is being filled.

(b) Monitoring for HAP ABA and polyol added to the foam production line (which includes the existing flat block pour line and the new VPF line) at the mixhead.

(1) The Permittee shall comply with the provisions in paragraph (b)(1)(i) below.

(i) The Permittee shall continuously monitor the amount of polyol added at the mixhead when foam is being poured, in accordance with paragraphs (b)(2) through (4) below.

(2) The owner or operator shall monitor either:

(i) Pump revolutions; or

(ii) Flow rate.

(3) The device used to monitor the parameter from paragraph (b)(2) shall have an accuracy to within +/- 2.0 percent of the HAP ABA being measured, and shall be calibrated initially, and periodically, in accordance with paragraph (b)(3)(i) or (ii) below.

(i) For polyol pumps, the device shall be calibrated at least once each 6 months.

(ii) For HAP ABA pumps, the device shall be calibrated at least once each month.

(4) Measurements must be recorded at the beginning and end of the production of each grade of foam within a run of foam.

(c) Monitoring of HAP ABA in a storage vessel.

The amount of HAP ABA in a storage vessel shall be determined weekly by monitoring the HAP ABA level in the storage vessel using a level measurement device that meets the criteria described in paragraphs (c)(1) and either (c)(2) or (c)(3) below.

(1) The level measurement device must be calibrated initially and at least once per year thereafter.

(2) With the exception of visually-read level measurement devices (i.e., gauge glass), the device must have either a digital or printed output.

(3) If the level measurement device is a visually-read device, the device must be equipped with permanent graduated markings to indicate HAP ABA level in the storage tank.

(d) Monitoring of HAP ABA added to a storage vessel.

The amount of HAP ABA added to a storage vessel during a delivery shall be determined in accordance with either paragraphs (d)(1), (2), or (3) of this section.

(1) The volume of HAP ABA added to the storage vessel shall be determined by recording the volume in the storage vessel prior to the delivery and the volume after the delivery, provided that the storage tank level measurement device used to determine the levels meets the criteria in paragraph (c) above.

(2) The volume of HAP ABA added to the storage vessel shall be determined by monitoring the flow rate using a device with an accuracy of +/- 2.0 percent, and calibrated initially and at least once each six months thereafter.

(3) The weight of HAP ABA added to the storage vessel shall be calculated as the difference of the full weight of the transfer vehicle prior to unloading into the storage vessel and the empty weight of the transfer vehicle after unloading into the storage vessel. The weight shall be determined using a scale meeting the requirements of either paragraph (d)(3)(i) or (ii) below.

(i) A scale approved by the State or local agencies using the procedures contained in Handbook 44, Specifications, Tolerances, and Other Technical Requirements for Weighing and Measuring Devices 1998 (incorporation by reference--see 40 CFR 63.14).

(ii) A scale determined to be in compliance with the requirements of the National Institute of Standards and Technology Handbook 44 at least once per year by a registered scale technician.

These monitoring conditions are necessary to ensure compliance with the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR Part 63.1290 through 63.1309, Subpart III, "National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production"), 326 IAC 8-1-6 (BACT), and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this Flexible Polyurethane Foam Production plant shall be subject to the conditions of this Part 70 permit 033-17552-00047.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Foamex, L.P.
Source Location:	2211 South Wayne Street, Auburn, Indiana 46706
County:	DeKalb
SIC Code:	3086
Operation Permit No.:	T033-17552-00047
Permit Reviewer:	Trish Earls / EVP

On July 15, 2004, the Office of Air Quality (OAQ) had a notice published in the Auburn Evening Star in Auburn, Indiana, stating that Foamex, L.P. had applied for a Part 70 Operating Permit Renewal for the operation of a stationary Flexible Polyurethane Foam production plant. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit Renewal for this operation and provided information on how the public could review the proposed Part 70 Operating Permit Renewal 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 Part 70 Operating Permit Renewal should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit Renewal. Bolded language has been added and the language with a line through it has been deleted.

1. Condition C.17, Emission Statement, has been revised to incorporate the revisions to 326 IAC 2-6 that became effective March 27, 2004. The revised rule was published in the April 1, 2004 Indiana Register. This source is required to submit an emission statement triennially by July 1 pursuant to 326 IAC 2-6-3(a)(2) and (b)(1). Condition C.17 is revised as follows:

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)] [326 IAC 2-6]

~~(a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6. The emission statement shall meet the following requirements:~~

(a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emission of ~~pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting)~~ **all pollutants listed in 326 IAC 2-6-4(a)**;

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

(b) The emission statement 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.

2. The third sentence on the Quarterly Deviation and Compliance Monitoring Report form has been updated to be consistent with condition B.14 (a) Deviations from Permit Requirements and Conditions. It was not clear on the report form that the deviations that are not required to be reported on that form are those that are deviations required to be reported pursuant to an applicable requirement that exists independent of the permit. The first paragraph on the form is revised as follows:

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. ~~Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.** Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

3. Condition D.1.7 is revised to include reference to the First Significant Source Modification No. 033-13706-00047, issued on June 25, 2001 and the Second Significant Source Modification No. 033-15727-00047, issued on November 26, 2003 in which the requirements pursuant to 326 IAC 8-1-6 (BACT) for the VPF line were established.

D.1.7 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), **First Significant Source Modification No. 033-13706-00047, issued on June 25, 2001 and Second Significant Source Modification No. 033-15727-00047, issued on November 26, 2003,** the Best Available Control Technology (BACT) for the VPF line shall be the following:

(a) Operation of the carbon adsorber to control total VOC emissions from the VPF line at all times that the VPF line is in operation. The carbon adsorber shall operate at a minimum total VOC (including TDI, MDI, and tertiary amine VOC) overall control efficiency of 51%.

(b) The production of polyurethane foam in the VPF line shall be limited to a maximum of 800,000,000 board feet per year. This production limit will limit the usage of tertiary amines and TDI such that the emissions of VOC will be limited to 14.6 tons per year after control by the carbon adsorber.

Emissions shall be calculated using the following:

(1) VOC emissions from amine catalyst usage in the VPF line shall be calculated using the following equation:
VOC emissions from VPF line (tons) =
Amine catalyst usage (gal) x density (lbs/gal) x tertiary amine % (weight) x 1 ton / 2000 lbs x (1 - overall tertiary amine control efficiency of carbon adsorber on VPF line)

(A) The amine catalyst is comprised of volatile organics and non-volatile organics that are consumed in foam production process. Based on manufacturer's data, the volatile organic constituent of the amine catalyst is the tertiary amine. Therefore, VOC emissions from the amine catalyst shall be equivalent to the percent by weight of the tertiary amine constituent as shown above.

(B) VOC emissions from TDI and MDI usage in the VPF line shall be calculated using the following equation:

VOC emissions from VPF line (tons) =
TDI or MDI usage (lbs) x 0.0016% x 1 ton / 2000 lbs x (1 - overall VOC control efficiency of carbon adsorber on VPF line)

where:

TDI or MDI usage (lbs) = TDI or MDI containing pre-polymer usage (gal) x density (lbs/gal) x TDI or MDI % (weight)

(C) VOC emissions from the VPF line shall be calculated based on the use of a carbon adsorber with a minimum total VOC (including TDI, MDI, and tertiary amine VOC) overall control efficiency of 51%.

Appendix A: Emission Calculations
Emissions Summary

Company Name: Foamex, L.P.
Address City IN Zip: 2211 South Wayne Street, Auburn, IN 46706
Operation Permit No.: 033-17552
Plt ID: 033-00047
Reviewer: Trish Earls/EVP

Total Potential To Emit (tons/year)

	Emissions Generating Activity						
Pollutant	Rebond Mold Units (1)	Building Fugitives	Boilers	VPF Line using TDI and amines in Foam Production	VPF Line using MDI and Methylene Chloride in Foam Production	Baumer Loop Slitters	**TOTAL**
PM	20.28	0.00	0.26	0.00	0.00	0.00	20.54
PM10	20.28	0.00	1.05	0.00	0.00	0.00	21.33
SO2	0.00	0.00	0.08	0.00	0.00	0.00	0.08
NOx	0.00	0.00	13.80	0.00	0.00	0.00	13.80
VOC	8.45	8.94	0.76	109.56	0.03	3.49	131.23
CO	0.00	0.00	11.59	0.00	0.00	0.00	11.59
total HAPs	8.45	4.12	0.26	0.72	223.70	0.01	237.26
worst case single HAP	(TDI/MDI) 8.45	(Methylene Chloride) 4.12	(Hexane) 0.25	(2,4 TDI) 0.72	(methylene chloride) 223.66	(1,2 Epoxybutane) 0.01	(methylene chloride) 223.66

Total Limited Potential To Emit (tons/year)

	Emissions Generating Activity						
Pollutant	Rebond Mold Units (1)	Building Fugitives	Boilers	VPF Line using TDI and amines in Foam Production	VPF Line using MDI and Methylene Chloride in Foam Production	Baumer Loop Slitters	**TOTAL**
PM	20.28	0.00	0.26	0.00	0.00	0.00	20.54
PM10	20.28	0.00	1.05	0.00	0.00	0.00	21.33
SO2	0.00	0.00	0.08	0.00	0.00	0.00	0.08
NOx	0.00	0.00	13.80	0.00	0.00	0.00	13.80
VOC	8.45	8.94	0.76	14.54	1.6E-02	3.49	36.20
CO	0.00	0.00	11.59	0.00	0.00	0.00	11.59
total HAPs	8.45	4.12	0.26	0.10	223.68	0.01	236.62
worst case single HAP	(TDI/MDI) 8.45	(Methylene Chloride) 4.12	(Hexane) 0.25	(2,4 TDI) 0.10	(methylene chloride) 223.66	(1,2 Epoxybutane) 0.01	(methylene chloride) 223.66

(1) A PM emission factor of 4.63 lbs PM/hr for EU-R1, EU-R2, EU-R3, and EU-R4 combined was based on stack testing of these units on January 9-11 and 17, 2002.
(4.63 lb/hr) x 8760 hrs/yr x 1 ton/2000 lbs = 20.28 tons/yr.

Appendix A: Emission Calculations
VOC Emissions

Company Name: Foamex, L.P.
Address City IN Zip: 2211 South Wayne St. Auburn, Indiana 46706
Operation Permit No.: 033-17552
Plt ID: 033-00047
Reviewer: TE/EVP

Potential Emissions:

Material	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Volatile Organics	Potential Material Usage Rate (lbs/hr)	Material Usage Rate (gal/hr)	Potential VOC pounds per hour	Potential VOC tons per year
Chemical Solvent (Building Fugitives)	8.93	100.00%	0.00%	100.00%	2.04	0.23	2.04	8.94
Water Based Adhesives (Building Fugitives)	8.85	46.00%	46.00%	0.00%	8.22	0.93	0.00	0.00
Baumer Loop Slitters Adhesive	10.30	72.52%	0.00%	72.52%	1.10	0.11	0.80	3.49
							2.84	**12.43**

Material	VOC Emission Factor (lb/hr) (1)	Potential VOC pounds per hour	Potential VOC tons per year
MDI / TDI (EU-R1,R2,R3,R4)	1.93	1.93	8.45

TOTAL VOC EMISSIONS:	**4.77**	**20.88**

Note:
(1) Emission factor from VOC stack testing performed on the four (4) rebond mold facilities identified as EU-R1, EU-R2, EU-R3, and EU-R4 on January 9-11 and 17, 2002.
*TDI (Toluene diisocyanate) and MDI (Methylenediphenyl diisocyanate) assumed all VOC
Methodology:
Weight % Organics = Weight % Volatiles - Weight % Water
Potential VOC Pounds per Hour = Density (lb/gal) * Maximum Potential Gal of Material (gal/hr) * Weight % Volatile
Potential VOC Tons per Year = Pounds of VOC per hour * (8760 hr/yr) * (1 ton/2000 lbs)

Appendix A: Emission Calculations
HAP Emissions
From Foam Production Line

Company Name: Foamex, L.P.
Address City IN Zip: 2211 South Wayne St. Auburn, Indiana 46706
Operation Permit No.: 033-17552
Plt ID: 033-00047
Reviewer: TE/EVP

Potential HAP Emissions:

Material	Process Exhaust	Density (Lb/Gal)	Weight % HAPS	Material Usage Rate (lbs/hr)	Material Usage Rate (gal/hr)	Potential HAP pounds per hour	Potential HAPS (tons/yr)
Methylene Chloride	Chemical Solvent (Building Fugitive)	11.10	100.00%	0.94	0.08	0.94	4.12
Simalfa Adhesive	Adhesives (Building Fugitives)	8.85	0.00%	8.22	0.93	0.00	0.00
1,2 Epoxybutane	Adhesives (Baumer Loop Slitters)	10.30	0.30%	1.10	0.11	0.00	0.01

Material	HAP Emission Factor (lb/hr) (1)	Potential HAP pounds per hour	Potential HAP tons per year
TDI / MDI (EU-R1,2,3,4)	1.93	1.93	8.45

TOTAL POTENTIAL HAP EMISSIONS	**2.87**	**12.59**

Note:
(1) Emission factor from VOC stack testing performed on the four (4) rebond mold facilities identified as EU-R1, EU-R2, EU-R3, and EU-R4 on January 9-11 and 17, 2002.
*TDI (Toluene diisocyanate) and MDI (Methylenediphenyl diisocyanate) assumed all VOC
Methodology:
Weight % HAP = Weight % HAP - Weight % Water
Potential HAP Pounds per Hour = Density (lb/gal) * Gal of Material (gal/hr) * Weight % HAP (based on worst case mass balance)
Potential HAP Tons per Year = Pounds of HAP per hour * (8760 hr/yr) * (1 ton/2000 lbs)

Appendix A: Emissions Calculations
VOC and HAP Emissions
From VPF Unit Using TDI in Foam Production

Company Name: Foamex, L.P.
Address City IN Zip: 2211 South Wayne St. Auburn, Indiana 46706
Operation Permit No.: 033-17552
Plt ID: 033-00047
Reviewer: TE/EVP

Material	Weight % Volatile Organics	Maximum Hourly Usage (lb/hr)	Potential VOC pounds per hour	Potential VOC tons per year	Maximum Usage per Board Feet of Foam Produced (lb/board ft)	Maximum Foam Production Rate (board ft/yr)	Limited Annual Usage (lb/yr)	Limited VOC tons per year
TDI 80/20	0.0016%	15,000	0.24	1.05	4.4E-02	800,000,000	35,586,640	0.28
Amine 2FX	16.00%	22	3.56	15.57	6.6E-05	800,000,000	52,718	4.22
Amine ZF-123	23.00%	21	4.82	21.11	6.2E-05	800,000,000	49,712	5.72
Amine ZF-24	23.00%	0.27	0.06	0.28	8.2E-07	800,000,000	652	0.07
Amine TD-33A	33.00%	3	0.91	4.00	8.2E-06	800,000,000	6,561	1.08
Amine TD-20	100.00%	15	14.75	64.59	4.4E-05	800,000,000	34,986	17.49
Amine 8154	32.00%	2	0.58	2.53	5.4E-06	800,000,000	4,287	0.69
Amine A-127	24.00%	0.41	0.10	0.43	1.2E-06	800,000,000	965	0.12
State Potential Emissions			**25.01**	**109.56**				**29.67**

Material	Carbon Adsorber Control Efficiency (%)	Controlled VOC tons per year
TDI	51.00%	0.14
Amines	51.00%	14.40
	TOTAL	**14.54**

Note: 0.0011% of TDI usage is 2,4 TDI, which is also a HAP. Therefore, potential HAP emissions are 0.17 lb/hr or 0.72 ton/yr. Limited controlled 2,4 TDI emissions are 0.096 ton/yr.

METHODOLOGY

Potential VOC Pounds per Hour = Weight % Volatile Organics * Maximum Hourly Usage (lb/hr)
Potential VOC Tons per Year = Maximum Hourly Usage (lb/hr) * Weight % Volatile Organics * 8760 hrs/yr * (1 ton/2000 lbs)
Maximum Usage per Board Feet of Foam Produced is based on information provided by Foamex, L.P.

Appendix A: Emissions Calculations
VOC and HAP Emissions
From VPF Unit Using MDI in Foam Production

Company Name: Foamex, L.P.
Address City IN Zip: 2211 South Wayne St. Auburn, Indiana 46706
Operation Permit No.: 033-17552
Plt ID: 033-00047
Reviewer: TE/EVP

Material	Weight % Volatile Organics	Maximum Annual Usage (lb/yr)	Potential VOC tons per year	Potential HAP tons per year	Carbon Adsorber Control Efficiency (%)	Controlled VOC tons per year	Controlled HAP tons per year
MDI	0.0016%	4,000,000	0.03	0.03	51.00%	1.6E-02	1.6E-02
Methylene Chloride	0.00%	447,329	0.00	223.66	0.00%	0.00	223.66
State Potential Emissions			**0.03**	**223.70**		**1.6E-02**	**223.68**

Note: The vapor pressure of MDI is approximately one-fourth that of TDI. The worst case assumption is that the same % of MDI is released as VOC as is for TDI.
Methylene Chloride is not a VOC, however it is a HAP. The methylene chloride usage is set by the formulation factors in the MACT standard.

METHODOLOGY

Potential VOC Tons per Year = Maximum Annual Usage (lb/yr) * Weight % Volatile Organics * (1 ton/2000 lbs)
The vendor's minimum guaranteed control efficiency of the activated carbon for MDI is greater than 95%. However, the control efficiency for overall VOC of 51% is used so that test results for overall VOC control efficiency will demonstrate compliance for the control device.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: Foamex, L.P.
Address City IN Zip: 2211 South Wayne St. Auburn, Indiana 46706
Operation Permit No.: 033-17552
Plt ID: 033-00047
Reviewer: TE/EVP

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
31.5	275.9

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.26	1.05	0.08	13.80	0.76	11.59

*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 7 for HAPs emissions calculations.

updated 4/99

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: Foamex, L.P.
Address City IN Zip: 2211 South Wayne St. Auburn, Indiana 46706
Operation Permit No.: 033-17552
Plt ID: 033-00047
Reviewer: TE/EVP

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.897E-04	1.656E-04	1.035E-02	2.483E-01	4.691E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	6.899E-05	1.518E-04	1.932E-04	5.243E-05	2.897E-04

Methodology is the same as page 6.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.