



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: July 21, 2006
RE: Johns Manville / 099-17832-00042
FROM: Nisha Sizemore
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 according to IC 13-15-6-3, 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 and IC 13-15-6-1 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, **within eighteen (18) calendar days of the mailing of this notice**. 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.

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
FNPER.dot 03/23/06



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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**Johns Manville
1215 West Dewey Street
Bremen, Indiana 46506**

(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 provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. 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 2-8 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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 FESOP under 326 IAC 2-8.

Operation Permit No.: F 099-17832-00042	
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: July 21, 2006 Expiration Date: July 21, 2011

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	5
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
SECTION B	GENERAL CONDITIONS	8
B.1	Definitions [326 IAC 2-8-1]	
B.2	Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]	
B.6	Severability [326 IAC 2-8-4(4)]	
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.8	Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.10	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.11	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.12	Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.13	Emergency Provisions [326 IAC 2-8-12]	
B.14	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]	
B.17	Permit Renewal [326 IAC 2-8-3(h)]	
B.18	Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]	
B.19	Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]	
B.20	Permit Revision Requirement [326 IAC 2-8-11.1]	
B.21	Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC13-30-3-1]	
B.22	Transfer of Ownership or Operational Control [326 IAC 2-8-10] [IC 13-17-3-2]	
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
B.24	Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]	
SECTION C	SOURCE OPERATION CONDITIONS	17
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Overall Source Limit [326 IAC 2-8]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]	
	Testing Requirements [326 IAC 2-8-4(3)]	
C.9	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.10	Compliance Requirements [326 IAC 2-1.1-11]	

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]
[326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

- C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS: Foam panel manufacturing line..... 24

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.1 Particulate [326 IAC 6-3-2]
- D.1.2 PSD and FESOP Limitations (PM, PM₁₀ and VOC) [326 IAC 2-2] [326 IAC 2-8-4]
- D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 2-2] [326 IAC 2-8-4]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]
- D.1.6 Particulate Control

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.1.7 Visible Emissions Notations
- D.1.8 Parametric Monitoring
- D.1.9 Broken or Failed Bag Detection
- D.1.10 Cyclone Failure Detection
- D.1.11 Thermal Oxidizer Temperature
- D.1.12 Parametric Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.1.13 Record Keeping Requirements
- D.1.14 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS: Insignificant Activities 30

Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

Certification Form	31
Emergency Occurrence Form	32
Quarterly Report Forms	34
Quarterly Deviation and Compliance Monitoring Report Form	36

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 2-8-3(b)]

The Permittee owns and operates a stationary rigid polyisocyanurate foam panel manufacturing source.

Authorized individual:	Plant Manager
Source Address:	1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address:	1215 West Dewey Street, Bremen, Indiana 46506
General Source Phone:	(574) 546-4666
SIC Code:	3086
Source Location Status:	Marshall
	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)
	Minor Source, under PSD Rules
	Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) foam head, identified as EU1, uncontrolled and exhausting to Stack 202, capacity: 105,000 board feet per hour.
- (b) One (1) foaming laminator, identified as EU2, uncontrolled and exhausting to Stack 201, capacity: 105,000 board feet per hour.
- (c) One (1) inline cutting process, identified as EU3, consisting of an edge trim saw, cross cut saw, and gang saw, equipped with a cyclone and baghouse dust collector system for particulate control which exhausts to a regenerative thermal oxidizer for VOC control, exhausting to Stack CD-1, capacity: 105,000 board feet per hour. The dust collector system consists of a primary baghouse and a secondary pre-filter dust collector which is only utilized if and when the primary baghouse malfunctions.
- (d) One (1) foot slicer, identified as FS, equipped with a cyclone and baghouse dust collector system for particulate control which exhausts to a regenerative thermal oxidizer for VOC control, exhausting to Stack CD-1, capacity: 640 board feet per hour.
- (e) One (1) panel saw, identified as PS, equipped with a cyclone and baghouse dust collector system for particulate control which exhausts to a regenerative thermal oxidizer for VOC control, exhausting to Stack CD-1, capacity: 640 board feet per hour.
- (f) One (1) warehouse area, identified as EU4, consisting of curing, staging and shipping areas for the finished panels, capacity: 105,000 board feet per hour.
- (g) One (1) waste recycling process, identified as EU5, including one (1) hogger, equipped with a dust collector for particulate control, exhausting to Stack BH-2, capacity: 11,520 board feet per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) 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 oil, hydraulic oils, machining oils, and machining fluids.
- (b) Equipment used exclusively for the following: Packaging lubricants and greases, filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (c) Cleaners and solvents having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (d) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (e) Replacement or repair of bags in baghouses and filters in other air filtration equipment.
- (f) Heat exchanger cleaning and repair.
- (g) Process vessel degassing and cleaning to prepare for internal repairs.
- (h) Paved and unpaved roads and parking lots with public access.
- (i) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (j) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (k) One (1) Cricket saw, with particulate matter emissions less than 5 pounds per hour or 25 pounds per day. [326 IAC 6-3-2]
- (l) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP: Spray degreaser operation.
- (m) The following VOC storage tanks, with VOC emissions less than 3 pounds per hour or 15 pounds per day:
 - (1) Two (2) tanks, identified as Tank 1 and Tank 2, capacity: 8,661 gallons, each.
 - (2) Two (2) tanks, identified as Tank 3 and Tank 6, capacity: 5,294 gallons, each.
 - (3) Four (4) tanks, identified as Tank 4, Tank 5, Tank 7 and Tank 8, capacity: 5,640 gallons, each.

- (4) One (1) tank, identified as Tank 9, capacity: 5,434 gallons.
- (5) One (1) tank, identified as Tank 10, capacity: 1,316 gallons.
- (n) One (1) pressure vessel designed to operate in excess of 204.9 kPa and without emissions to the atmosphere, identified as Tank 11.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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 2-8-4(2)] [326 IAC 2-1.1-9.5]

- (a) This permit, 099-17832-00042, 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 of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6]

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.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (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 an authorized individual 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. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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 no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (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 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (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) 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 PMPs do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) 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.13 Emergency Provisions [326 IAC 2-8-12]

- (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 except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or 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, 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: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

- (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
Indianapolis, Indiana 46204-2251

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 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.

- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 099-17832-00042 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), 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
Indianapolis, Indiana 46204-2251

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 need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissu-

ance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-8(a)]
- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (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 until the renewal permit has been issued or denied.
- (c) **Right to Operate After Application for Renewal [326 IAC 2-8-9]**
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 2-8 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 needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d), 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 approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in 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
Indianapolis, Indiana 46204-2251

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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make 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 2-8-15(b), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at 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 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC13-30-3-1]

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 FESOP 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, at reasonable times, 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 at reasonable times, 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, at reasonable times, 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 2-8-10] [IC 13-17-3-2]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [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) 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 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [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 one hundred (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.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 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.4 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.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

C.6 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.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 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
Indianapolis, Indiana 46204-2251

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-4(3)]

C.9 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
Indianapolis, Indiana 46204-2251

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ 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.10 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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 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.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [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 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by

excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

- (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (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.18 General Reporting Requirements [326 IAC 2-8-4(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 "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (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
Indianapolis, Indiana 46204-2251
- (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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.19 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 2-8-4(10)]: Foam panel manufacturing line

- (a) One (1) foam head, identified as EU1, uncontrolled and exhausting to Stack 202, capacity: 105,000 board feet per hour.
- (b) One (1) foaming laminator, identified as EU2, uncontrolled and exhausting to Stack 201, capacity: 105,000 board feet per hour.
- (c) One (1) inline cutting process, identified as EU3, consisting of an edge trim saw, cross cut saw, and gang saw, equipped with a cyclone and baghouse dust collector system for particulate control which exhausts to a regenerative thermal oxidizer for VOC control, exhausting to Stack CD-1, capacity: 105,000 board feet per hour. The dust collector system consists of a primary baghouse and a secondary pre-filter dust collector which is only utilized if and when the primary baghouse malfunctions.
- (d) One (1) foot slicer, identified as FS, equipped with a cyclone and baghouse dust collector system for particulate control which exhausts to a regenerative thermal oxidizer for VOC control, exhausting to Stack CD-1, capacity: 640 board feet per hour.
- (e) One (1) panel saw, identified as PS, equipped with a cyclone and baghouse dust collector system for particulate control which exhausts to a regenerative thermal oxidizer for VOC control, exhausting to Stack CD-1, capacity: 640 board feet per hour.
- (f) One (1) warehouse area, identified as EU4, consisting of curing, staging and shipping areas for the finished panels, capacity: 105,000 board feet per hour.
- (g) One (1) waste recycling process, identified as EU5, including one (1) hogger, equipped with a dust collector for particulate control, exhausting to Stack BH-2, capacity: 11,520 board feet per hour.

(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 2-8-4(1)]

D.1.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the inline cutting process (EU3) shall not exceed 15.2 pounds per hour when operating at a process weight rate of 14,114.75 pounds per hour (7.06 tons per hour).
- (b) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the waste recycling process (EU5) shall not exceed 3.99 pounds per hour when operating at a process weight rate of 1,920 pounds per hour (0.96 tons per hour).
- (c) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the panel saw (PS) shall not exceed 4.12 pounds per hour when operating at a process weight rate of 2,016 pounds per hour (1.008 tons per hour).

The above pounds per hour limitations were 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:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.2 PSD and FESOP Limitations (PM, PM₁₀ and VOC) [326 IAC 2-2] [326 IAC 2-8-4]

- (a) PM and PM₁₀ emissions from the inline cutting process (EU3) shall not exceed 15.18 pounds per hour, equivalent to 66.49 tons per year.
- (b) PM and PM₁₀ emissions from the panel saw (PS) shall not exceed 4.12 pounds per hour, equivalent to 18.05 tons per year.
- (c) Pursuant to SPR 099-17820-00042 issued on December 30, 2003, the total amount of foam panels delivered to the waste recycling process (EU5) shall be limited to less than 1,000,000 board feet per twelve (12) consecutive month period, with compliance determined at the end of each month. This is equivalent to VOC emissions less than 4.65 tons per year, based on the measured emission rate of 0.0093 pounds of VOC per board foot of foam panel recycled.
- (d) PM₁₀ emissions from the waste recycling process (EU5) shall not exceed 0.0274 pounds per board foot, which is equivalent to 13.7 tons per year based on the annual limitation of 1,000,000 board feet delivered to the process. Compliance with this limit ensures compliance with Condition D.1.1(b).
- (e) PM emissions from the waste recycling process (EU5) shall not exceed 3.99 pounds per hour, equivalent to 17.48 tons per year.
- (f) Compliance with these limits and the BACT limits in Condition D.1.3 will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply. These limitations shall also render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to SPR 099-14499-00042, issued October 16, 2001, and 326 IAC 8-1-6, BACT for the rigid polyisocyanurate foam panel manufacturing process has been determined to be:

- (a) A regenerative thermal oxidizer shall be in operation at all times that the inline cutting process (EU3) is in operation, with an overall control efficiency of 90%.
- (b) Throughput for the entire rigid polyisocyanurate foam panel manufacturing process (EU1 through EU5) shall not exceed 678,356,560 board feet per twelve (12) consecutive month period, with compliance determined at the end of each month.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

On or before February 26, 2008, in order to demonstrate compliance with Condition D.1.3(a), the Permittee shall perform VOC testing of the regenerative thermal oxidizer, 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.1.6 Particulate Control

- (a) In order to comply with Conditions D.1.1 and D.1.2, the cyclone and baghouse dust collector system for particulate control shall be in operation and control emissions from the inline cutting process (EU3), the foot slicer (FS) and the panel saw (PS) at all times that the inline cutting process (EU3), the foot slicer (FS) and the panel saw (PS) are in operation.
- (b) In order to comply with Conditions D.1.1 and D.1.2, the dust collector system for particulate control shall be in operation and control emissions from the hogger in the waste recycling process (EU5) at all times that the hogger in the waste recycling process (EU5) is in operation.
- (c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.7 Visible Emissions Notations

- (a) Visible emission notations of the inline cutting process (EU3) stack exhaust (Stack CD-1) and the waste recycling process (EU5) stack exhaust (Stack BH-2) shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.8 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the dust collector system used in conjunction with the inline cutting process (EU3), at least once per day when the inline

cutting process (EU3) is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the primary baghouse is outside the normal range of 0.5 and 6.0 inches of water or a range established during the latest stack test, and the pressure drop across the secondary emergency dust collector is outside the normal range of 0.5 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (b) The Permittee shall record the pressure drop across the dust collector (BH-2) used in conjunction with the waste recycling process (EU5), at least once per day when the waste recycling process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.1 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (c) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.9 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

D.1.10 Cyclone Failure Detection

- (a) For a cyclone controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a cyclone controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency

and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.1.11 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as an hourly average, or shall be recorded continuously on a strip chart recorder. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature of 1400°F.
- (b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.3, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature as observed during the compliant stack test.

D.1.12 Parametric Monitoring

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.3, as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.13 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2(c), the Permittee shall maintain monthly records of the amount of foam panels delivered to the waste recycling process (EU5).
- (b) To document compliance with Condition D.1.3(b), the Permittee shall maintain monthly throughput records of the number of board feet of rigid polyisocyanurate foam panels manufactured.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records of the visible emission notations of the inline cutting process (Stack CD-1) and waste recycling (Stack BH-2) stack exhausts once per day.
- (d) To document compliance with Condition D.1.8, the Permittee shall maintain records once per day of the pressure drop during normal operation.
- (e) To document compliance with Conditions D.1.11 and D.1.12, the Permittee shall maintain the following:
 - (1) The continuous temperature records for the regenerative thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test.
 - (2) Daily records of the duct pressure or fan amperage.

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

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2(c) and D.1.3(b) 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (k) One (1) Cricket saw, with particulate matter emissions less than 5 pounds per hour or 25 pounds per day. [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 2-8-4(1)]

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

Pursuant to 326 IAC 6-3, the particulate from the cricket saw shall be limited by the following:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

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

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

Source Name: Johns Manville
Source Address: 1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP No.: F 099-17832-00042

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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Johns Manville
Source Address: 1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP No.: F 099-17832-00042

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), 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 Describe:
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**

FESOP Quarterly Report

Source Name: Johns Manville
Source Address: 1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP No.: F 099-17832-00042
Facilities: EU1 through EU5
Parameter: Amount of rigid polyisocyanurate foam panels manufactured
Limit: Less than a total of 678,356,560 board feet per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	Foam Panel Production (board feet)	Foam Panel Production (board feet)	Foam Panel Production (board feet)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
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**

FESOP Quarterly Report

Source Name: Johns Manville
Source Address: 1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP No.: F 099-17832-00042
Facility: EU5
Parameter: Amount of rigid polyisocyanurate foam panels delivered to the process
Limit: Less than 1,000,000 board feet per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	Foam Panel Throughput (board feet)	Foam Panel Throughput (board feet)	Foam Panel Throughput (board feet)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Johns Manville
Source Address: 1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP No.: F 099-17832-00042

Months: _____ to _____ Year: _____

Page 1 of 2

<p>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 <input type="checkbox"/> No deviations occurred this reporting period.</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> 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:	

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: _____

A certification is not required for this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Federally Enforceable State Operating Permit (FESOP)

Source Name:	Johns Manville
Source Location:	1215 West Dewey Street, Bremen, Indiana 46506
County:	Marshall
SIC Code:	3086
Permit No.:	F 099-17832-00042
Permit Reviewer:	Edward A. Longenberger

On February 24, 2006, the Office of Air Quality (OAQ) had a notice published in the Pilot News in Plymouth, Indiana, stating that Johns Manville had applied for a Federally Enforceable State Operating Permit (FESOP) to continue to operate a rigid polyisocyanurate foam panel manufacturing source with cyclones, baghouses and a thermal oxidizer for pollution control. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP 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 FESOP should be issued as proposed.

On March 23, 2006, Raymond Darmer of Johns Manville submitted comments on the proposed FESOP. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

Section A.2(c) and D.1(c) – Request modification in the last sentence as follows “The dust collector system consists of a primary baghouse and a secondary pre-filter dust collector which is only utilized should the primary baghouse malfunction.”

Response 1:

IDEM, OAQ has attempted to clarify the sentence as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (c) One (1) inline cutting process, identified as EU3, consisting of an edge trim saw, cross cut saw, and gang saw, equipped with a cyclone and baghouse dust collector system for particulate control which exhausts to a regenerative thermal oxidizer for VOC control, exhausting to Stack CD-1, capacity: 105,000 board feet per hour. The dust collector system consists of a primary baghouse and a secondary pre-filter dust collector **which that** is only utilized **if and** when the primary baghouse malfunctions.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Foam panel manufacturing line

- (c) One (1) inline cutting process, identified as EU3, consisting of an edge trim saw, cross cut saw, and gang saw, equipped with a cyclone and baghouse dust collector system for particulate control which exhausts to a regenerative thermal oxidizer for VOC control, exhausting to Stack CD-1, capacity: 105,000 board feet per hour. The dust collector system consists of a primary baghouse and a secondary pre-filter dust collector ~~which that~~ is only utilized **if and** when the primary baghouse malfunctions.

Comment 2:

Section A.3(e) – Request removal of reference to electrostatic precipitators, there are no electrostatic precipitators.

Response 2:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

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

Comment 3:

Sections D.2.2 and D.2.3 – Since submittal of the permit application the cold cleaner degreaser is no longer utilized at the facility. The information outlined in Sections D.2.2 and D.2.3 is not applicable to the existing cold clean degreasing operations utilized at the facility. Please remove this portion of Section D.2.

The cold clean degreaser process, which supports only the facility maintenance activities, has been replaced with the use of an aerosol based degreaser (i.e., aerosol cans), which will be supplemented in the near future with a non VOC/non-HAP Citrasolv product. Based on a maximum use of 7.5 lb/month, a volatile organic content (VOC) content of 97% and a HAP content of 97% (trichloroethylene), the aerosol-based degreaser has the potential to emit 85 pounds per year of VOCs and HAP. This then is considered an insignificant activity under the FESOP.

Response 3:

The aerosol spray degreaser is not regulated under 326 IAC 8-3 because it does not meet the definition of a cold cleaner degreasing unit, an open top vapor degreaser or a conveyORIZED degreaser as defined in 326 IAC 1-2-18.5, 326 IAC 1-2-49.5 or 326 IAC 1-2-21.5, respectively. A spray cleaner containing halogenated solvent is not regulated by 40 CFR 63, Subpart T. Therefore, the degreasing operation will be listed in the FESOP as an insignificant activity with the potential to emit less than one ton per year of a single HAP, as shown:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (l) ~~Gold cleaning degreaser VOC emissions less than 3 pounds per hour or 15 pounds per day. [326 IAC 8-3-2] [326 IAC 8-3-5]~~ **Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP: Spray degreaser operation.**

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (k) One (1) Cricket saw, with particulate matter emissions less than 5 pounds per hour or 25 pounds per day. [326 IAC 6-3-2]
- ~~(l) Cold cleaning degreaser VOC emissions less than 3 pounds per hour or 15 pounds per day. [326 IAC 8-3-2] [326 IAC 8-3-5]~~

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

~~D.2.2 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.~~

~~D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]~~

~~(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:~~

- ~~(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:~~
- ~~(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));~~
- ~~(B) The solvent is agitated; or~~

- (C) ~~The solvent is heated.~~
- (2) ~~Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three tenths (4.3) kiloPascals (thirty two (32) millimeters of mercury or six tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.~~
- (3) ~~Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).~~
- (4) ~~The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.~~
- (5) ~~Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three tenths (4.3) kiloPascals (thirty two (32) millimeters of mercury or six tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):~~
- (A) ~~A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.~~
- (B) ~~A water cover when solvent is used is insoluble in, and heavier than, water.~~
- (C) ~~Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.~~
- (b) ~~Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for cold cleaning facility construction of which commenced after July 1, 1990, the Permittee shall ensure that the following operating requirements are met:~~
- (1) ~~Close the cover whenever articles are not being handled in the degreaser.~~
- (2) ~~Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.~~
- (3) ~~Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.~~

Upon further review, the OAQ has decided to make the following changes to the FESOP: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Change 1:

Condition A.5 has been moved to Condition B.14 of the permit. All subsequent B Conditions have been re-numbered accordingly:

~~A.5 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 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 099-17832-00042 and issued pursuant to permitting programs approved into the state implementation plan have been either:**
- (1) incorporated as originally stated,**
 - (2) revised, or**
 - (3) deleted.**
- (b) All previous registrations and permits are superseded by this permit.**

Change 2:

Condition B.11 has been revised since the annual compliance certification need not be in letter form:

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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:**

Change 3:

Condition B.1 is now found in the fourth paragraph of the cover page of the permit:

~~B.1 Permit No Defense [IC 13]~~

~~Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 FESOP under 326 IAC 2-8.~~

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**Johns Manville
1215 West Dewey Street
Bremen, Indiana 46506**

(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 provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. 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 2-8 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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 FESOP under 326 IAC 2-8.

Operation Permit No.: F 099-17832-00042	
Issued by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

Change 4:

Condition B.2 (Permit Term) has been modified as shown. Also, Condition B.3 (Terms of Conditions) has been added:

B.2 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]

- (a)** This permit, **099-17832-00042**, 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 of this permit.

- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

Change 5:

The Emergency Provisions condition has been updated as follows:

B.13 Emergency Provisions [326 IAC 2-8-12]

~~(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 health-based or 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, 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

~~(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
Indianapolis, Indiana 46204-2254

~~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 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(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) — The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) 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 2-8 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.~~
- (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 except as provided in 326 IAC 2-8-12.**
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or 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, 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: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

- (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
Indianapolis, Indiana 46204-2251

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 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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) **The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) 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 2-8 and any other applicable rules.**
- (g) **Operations may continue during an emergency only if the following conditions are met:**
 - (1) **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.**
 - (2) **If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:**
 - (A) **The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and**
 - (B) **Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.**

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) **The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.**

Change 6:

Condition D.1.2 has been changed as shown:

D.1.2 PSD and FESOP Limitations (PM, PM₁₀ and VOC) [326 IAC 2-2] [326 IAC 2-8-4]

- (d) **PM₁₀ emissions from the waste recycling process (EU5) shall not exceed 0.0274 pounds per board foot, which is equivalent to 13.7 tons per year at **based on** the annual limitation of 1,000,000 board feet delivered to the process. Compliance with this limit ensures compliance with Condition D.1.1(b).**

Change 7:

The Permittee has agreed that a pressure drop range of 0.5 to 6.0 for the dust collection equipment at EU3 is appropriate:

D.1.8 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the dust collector system used in conjunction with the inline cutting process (EU3), at least once per day when the inline cutting process (EU3) is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the primary baghouse is outside the normal range of 0.5~~4~~ and 6.0 inches of water or a range established during the latest stack test, and the pressure drop across the secondary emergency dust collector is outside the normal range of 0.5~~4~~ and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	Johns Manville
Source Location:	1215 West Dewey Street, Bremen, Indiana 46506
County:	Marshall
SIC Code:	3086
Operation Permit No.:	F 099-8546-00042
Operation Permit Issuance Date:	June 15, 1999
Permit Renewal No.:	F 099-17832-00042
Permit Reviewer:	Edward A. Longenberger

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Johns Manville relating to the operation of a rigid polyisocyanurate foam panel manufacturing source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) foam head, identified as EU1, installed in 1990, uncontrolled and exhausting to Stack 202, capacity: 105,000 board feet per hour.
- (b) One (1) foaming laminator, identified as EU2, installed in 1990, uncontrolled and exhausting to Stack 201, capacity: 105,000 board feet per hour.
- (c) One (1) inline cutting process, identified as EU3, installed in 1990, consisting of an edge trim saw, cross cut saw, and gang saw, equipped with a cyclone and baghouse dust collector system for particulate control which exhausts to a regenerative thermal oxidizer for VOC control, exhausting to Stack CD-1, capacity: 105,000 board feet per hour. The dust collector system consists of a primary baghouse, and a secondary pre-filter dust collector that is only utilized when the primary baghouse malfunctions.
- (d) One (1) foot slicer, identified as FS, modified in 2003 to replace the saw blade with a perforator device, equipped with a cyclone and baghouse dust collector system for particulate control which exhausts to a regenerative thermal oxidizer for VOC control, exhausting to Stack CD-1, capacity: 640 board feet per hour.
- (e) One (1) panel saw, identified as PS, installed in 1990, equipped with a cyclone and baghouse dust collector system for particulate control which exhausts to a regenerative thermal oxidizer for VOC control, exhausting to Stack CD-1, capacity: 640 board feet per hour.
- (f) One (1) warehouse area, identified as EU4, installed in 1990, consisting of curing, staging and shipping areas for the finished panels, capacity: 105,000 board feet per hour.
- (g) One (1) waste recycling process, identified as EU5, installed in 1990, including one (1) hogger, equipped with a dust collector for particulate control, exhausting to Stack BH-2, capacity: 11,520 board feet per hour.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

- (a) 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 oil, hydraulic oils, machining oils, and machining fluids.
- (b) Equipment used exclusively for the following: Packaging lubricants and greases, filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (c) Cleaners and solvents having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (d) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) Heat exchanger cleaning and repair.
- (g) Process vessel degassing and cleaning to prepare for internal repairs.
- (h) Paved and unpaved roads and parking lots with public access.
- (i) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (j) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (k) One (1) Cricket saw, with particulate matter emissions less than 5 pounds per hour or 25 pounds per day. [326 IAC 6-3-2]
- (l) Cold cleaning degreaser VOC emissions less than 3 pounds per hour or 15 pounds per day. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (m) The following VOC storage tanks, with VOC emissions less than 3 pounds per hour or 15 pounds per day:
 - (1) Two (2) tanks, identified as Tank 1 and Tank 2, capacity: 8,661 gallons, each.

- (2) Two (2) tanks, identified as Tank 3 and Tank 6, capacity: 5,294 gallons, each.
- (3) Four (4) tanks, identified as Tank 4, Tank 5, Tank 7 and Tank 8, capacity: 5,640 gallons, each.
- (4) One (1) tank, identified as Tank 9, capacity: 5,434 gallons.
- (5) One (1) tank, identified as Tank 10, capacity: 1,316 gallons.
- (n) One (1) pressure vessel designed to operate in excess of 204.9 kPa and without emissions to the atmosphere, identified as Tank 11.

Existing Approvals

The source has been operating under the previous FESOP 099-8546-00042 issued on June 15, 1999, and the following amendments and revisions:

- (a) AAF 099-12050-00042 issued on April 5, 2000;
- (b) Reopening 099-13086-00042 issued on September 25, 2001;
- (c) SPR 099-14499-00042 issued on October 16, 2001; and
- (d) SPR 099-17820-00042 issued on December 30, 2003.

All conditions from previous approvals were incorporated into this FESOP except the following:

- (a) FESOP 099-8546-00042 issued on June 15, 1999

Condition D.1.2(b), which states that pursuant to 326 IAC 2-8, PM₁₀ emissions from the waste recycling process (EU5) shall not exceed 3.99 pounds per hour, equivalent to 17.5 tons per year.

Reason not incorporated: This limit has been changed to a limit of less than 0.0274 pounds per board foot, equivalent to 13.7 tons per year, in order to take advantage of the annual throughput limit of 1,000,000 board feet per year, and to ensure that PM₁₀ emissions from the entire source are less than one hundred (100) tons per year.

- (b) FESOP 099-8546-00042 issued on June 15, 1999

Condition D.1.3(c), which states that the thermal oxidizer must operate when the inline cutting process (EU3) is using VOC based blowing agents, and Condition D.1.3(d), which states that pursuant to 40 CFR 82.4(n) and 40 CFR 82.4(o), the use of HCFC based blowing agents shall be phased out by December 31, 2002.

Reason not incorporated: These two conditions were necessary during the phase-out period of the use of HCFC based blowing agents. Since the source no longer uses HCFC blowing agents, and therefore uses VOC based blowing agents at all times, these conditions are no longer necessary.

The following terms and conditions from previous approvals have been revised or added in this FESOP:

- (a) All references to the condition entitled, Compliance Response Plan - Preparation, Implementation, Records, and Reports, have been revised to reflect the new condition title, Response to Excursions or Exceedances.
- (b) IDEM has determined that once per day monitoring of visible emission notations is generally sufficient to ensure proper operation of the facility stack exhaust. IDEM has also determined that monitoring this parameter once per day is sufficient to satisfy the requirements of the FESOP rules at 326 IAC 2-8-4.
- (c) IDEM has determined that once per day monitoring of the control device is generally sufficient to ensure proper operation of the control device. IDEM has also determined that monitoring this parameter once per day is sufficient to satisfy the requirements of the FESOP rules at 326 IAC 2-8-4.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP renewal 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 FESOP renewal application for the purposes of this review was received on August 15, 2003. Additional information was received October 20, 2005 and January 19, 2006.

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

Emission Calculations

See pages 1 and 2 of Appendix A of this document for detailed emission calculations. Potential MDI emissions from the foam process and the cutting process were taken from the original FESOP 099-8546-00042, issued on June 15, 1999.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	701
PM ₁₀	701
SO ₂	-
VOC	728
CO	-
NO _x	-

HAPs	Unrestricted Potential Emissions (tons/yr)
Total HAPs	0.210

The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀ and VOC are greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. 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 this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/facility	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Foam head (EU1)	-	-	-	10.44	-	-	0.200
Foaming laminator (EU2)	-	-	-	21.2	-	-	
Inline cutting saws (EU3)	66.49	66.49	-	16.31	-	-	0.010
Foot slicer (FS)	negligible	negligible	-	0.589	-	-	-
Panel saw (PS)	18.05	18.05	-	0.589	-	-	-
Warehouse area (EU4)	-	-	-	3.55	-	-	-
Waste recycling (EU5)	17.48	13.7	-	4.65	-	-	-
Insignificant activities	1.75	1.75	-	1.00	-	-	-
Total Emissions	104	Less than 100	-	58.3	-	-	0.210

- (a) Unless otherwise stated below, the values in the table represent the unrestricted potential to emit.
- (b) The PM values for EU3, PS and EU5 represent the hourly allowable emission rates pursuant to 326 IAC 6-3-2 multiplied by 8,760 hours of operation per year.
- (c) The PM₁₀ limits for EU3 and PS have been set equal to the hourly allowable particulate emission rates pursuant to 326 IAC 6-3-2 multiplied by 8,760 hours of operation per year.
- (d) The PM₁₀ limit for EU5 represents the maximum allowable emissions that would ensure sourcewide annual emissions of less than one hundred (100) tons per year.
- (e) The VOC limit for EU3 is based on the BACT limit of 678,356,560 board feet per year and a minimum 90% control efficiency.

- (f) The VOC emissions for EU5 is based on uncontrolled emissions and the annual limited throughput of 1,000,000 board feet per year.

County Attainment Status

The source is located in Marshall County.

Pollutant	Status
PM ₁₀	Attainment
PM _{2.5}	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 (NO_x) 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 and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.
- (b) Marshall County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability - Entire Source section of this document.
- (c) Marshall County has been classified as attainment or unclassifiable in Indiana for all remaining 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.
- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 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 and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	7.14
PM ₁₀	7.14
SO ₂	-
VOC	49.09
CO	-
NO _x	-
Single HAP (MDI)	0.200
Combination HAPs	0.210

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) This information is based on data submitted by the company in the FESOP renewal application as well as the original FESOP application and Technical Support Document.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110b, Subpart Kb) are not included in this permit for any of the tanks at this source because Tanks 1 through 10 each have a capacity less than forty (40) cubic meters. Tank 11 is a pressure vessel designed to operate in excess of 204.9 kPa and without emissions to the atmosphere, and is exempted under 40 CFR 60.110b(d)(2).
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source, constructed in 2000, is a minor source under 326 IAC 2-2 (PSD) because the emissions of PM are limited to less than two hundred fifty (250) tons per year, and the emissions of PM₁₀ and VOC are each limited to less than one hundred (100) tons per year.

- (a) PM emissions from the inline cutting process (EU3) shall not exceed 15.18 pounds per hour, equivalent to 66.49 tons per year.
- (b) PM emissions from the panel saw (PS) shall not exceed 4.12 pounds per hour, equivalent to 18.05 tons per year.
- (c) PM emissions from the waste recycling process (EU5) shall not exceed 3.99 pounds per hour, equivalent to 17.48 tons per year.

Compliance with these limits and the limits required under 326 IAC 2-8-4 will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

326 IAC 2-6 (Emission Reporting)

This source is not located in Lake or Porter County, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

326 IAC 2-8-4 (FESOP)

- (a) PM₁₀ emissions from the inline cutting process (EU3) shall not exceed 15.18 pounds per hour, equivalent to 66.49 tons per year.
- (b) PM₁₀ emissions from the panel saw (PS) shall not exceed 4.12 pounds per hour, equivalent to 18.05 tons per year.
- (c) Pursuant to SPR 099-14499-00042, issued on October 16, 2001, in order to comply with the requirements of 326 IAC 8-1-6:
 - (1) A regenerative thermal oxidizer shall be in operation at all times that the inline cutting process (EU3) is in operation, with an overall control efficiency of 90%.
 - (2) Throughput for the entire rigid polyisocyanurate foam panel manufacturing process (EU1 through EU5) shall not exceed 678,356,560 board feet per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above throughput limitation and control efficiency requirement will result in potential VOC emissions from EU3 of 16.31 tons per year.

- (d) Pursuant to SPR 099-17820-00042 issued on December 30, 2003, the total amount of foam panels delivered to the waste recycling process (EU5) shall be limited to less than 1,000,000 board feet per twelve (12) consecutive month period, with compliance determined at the end of each month. This is equivalent to VOC emissions less than 4.65 tons per year, based on the measured emission rate of 0.0093 pounds of VOC per board foot of foam panel recycled.
- (e) PM₁₀ emissions from the waste recycling process (EU5) shall not exceed 0.0274 pounds per board foot, which is equivalent to 13.7 tons per year at the annual limitation of 1,000,000 board feet delivered to the process. Based on the information in Appendix A of this document, the PM₁₀ emissions from this process after control are 0.00167 pounds per board foot, which is less than the limited emission rate of 0.0274 pounds per board foot. Therefore, EU5 will comply with this limitation.

Compliance with these limits will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply. These limitations shall also render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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.

State Rule Applicability – Individual Facilities

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

This rigid polyisocyanurate foam panel manufacturing source will emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

- (a) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the inline cutting process (EU3) shall not exceed 15.2 pounds per hour when operating at a process weight rate of 14,114.75 pounds per hour (7.06 tons per hour). The cyclone and baghouse dust collector system for PM control shall be in operation at all times when the inline cutting process (EU3) is in operation, in order to comply with this limit.
- (b) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the waste recycling process (EU5) shall not exceed 3.99 pounds per hour when operating at a process weight rate of 1,920 pounds per hour (0.96 tons per hour). The dust collector system for PM control shall be in operation at all times when the hogger in the waste recycling process (EU5) is in operation, in order to comply with this limit.
- (c) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the panel saw (PS) shall not exceed 4.12 pounds per hour when operating at a process weight rate of 2,016 pounds per hour (1.008 tons per hour). The dust collector system for PM control shall be in operation at all times when the panel saw (PS) is in operation, in order to comply with this limit.

The above pounds per hour limitations were 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:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (d) The requirements of 326 IAC 6-3-2 are not applicable to the foot slicer (FS), because this process generates negligible amounts of particulate. The foot slicer no longer is equipped with a blade for cutting the foam panels. Instead, a perforator presses holes in the panels, and thus does not generate particulate emissions.

326 IAC 8-1-6 (New facilities: general reduction requirements)

Pursuant to SPR 099-14499-00042, issued on October 16, 2001, and 326 IAC 8-1-6, BACT for the rigid polyisocyanurate foam panel manufacturing process has been determined to be:

- (a) A regenerative thermal oxidizer shall be in operation at all times that the inline cutting process (EU3) is in operation, with an overall control efficiency of 90%.
- (b) Throughput for the entire rigid polyisocyanurate foam panel manufacturing process (EU1 through EU5) shall not exceed 678,356,560 board feet per twelve (12) consecutive month period, with compliance determined at the end of each month.

State Rule Applicability – Insignificant Activities

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

Pursuant to 326 IAC 6-3, the particulate from the cricket saw shall be limited by the following:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

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

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)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or

- (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for cold cleaning facility construction of which commenced after July 1, 1990, the Permittee shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Testing Requirements

A stack test in accordance with EPA Method 25A was performed February 26, 2003. This test showed that the VOC control efficiency of the thermal oxidizer was 98.1%. Therefore, compliance with the BACT requirement of 90.0% VOC control has been demonstrated. Pursuant to Condition D.1.5 of FESOP 099-8546-00042, this test shall be repeated no later than February 26, 2008, which is five (5) years from the date of this valid compliance demonstration.

Compliance Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. 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 appropriate corrective actions within a specific time period.

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

- (a) The inline cutting process (EU3) has applicable compliance monitoring conditions as specified below:
 - (1) Visible emissions notations of the inline cutting process (EU3) stack exhaust (Stack CD-1) shall be performed once per day during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting start up or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
 - (2) The Permittee shall record the pressure drop across the dust collector system used in conjunction with the inline cutting process (EU3), at least once per day when the inline cutting process (EU3) is in operation. When for any one reading, the pressure drop across the primary baghouse is outside the normal range of 0.1 and 6.0 inches of water or a range established during the latest stack test, and the pressure drop across the secondary emergency dust collector is outside the normal range of 0.1 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C -

Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

- (3) In the event that bag failure has been observed:
- (A) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
 - (B) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
 - (C) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (4) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as an hourly average, or shall be recorded continuously on a strip chart recorder. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature of 1400°F. The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.1.3, as approved by IDEM. On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature as observed during the compliant stack test.
- (5) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in condition D.1.3, as approved by IDEM. The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

These monitoring conditions are necessary because the dust collection system and the regenerative thermal oxidizer used in conjunction with the inline cutting process (EU3) must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 8-1-6, and 326 IAC 2-8 (FESOP).

(b) The waste recycling process (EU5) has applicable compliance monitoring conditions as specified below:

(1) Visible emissions notations of the waste recycling process (EU5) stack exhaust (Stack BH-2) shall be performed once per day during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting start up or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

(2) The Permittee shall record the pressure drop across the dust collector (BH-2) used in conjunction with the waste recycling process (EU5), at least once per day when the waste recycling process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.1 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(3) In the event that bag failure has been observed:

(A) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(B) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(C) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the

failed unit—has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the dust collector (BH-2) used in conjunction with the waste recycling process (EU5) must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this rigid polyisocyanurate foam panel manufacturing source shall be subject to the conditions of the **FESOP 099-17832-00042**.

Appendix A: Emission Calculations
Emission Calculations

Company Name: Johns Manville
Address City IN Zip: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP: 099-17832
Plt ID: 099-00042
Permit Reviewer: Edward A. Longenberger
Date: August 15, 2003

Unrestricted Potential to Emit

Emission Unit	Max Capacity	Pollutant	Emission Factor	Source of Emission Factor	Control Efficiency %	PM (tons/yr)	PM-10 (tons/yr)	SOx (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)
Foam Head (EU1)	105,000	VOC	2.27E-05	Stack Test	0.00%	0.00	0.00	0.00	0.00	10.44	0.00
	bdf/hr		(lb/bdf)								
Foaming Laminator (EU2)	105,000	VOC	4.61E-05	Stack Test	0.00%	0.00	0.00	0.00	0.00	21.2	0.00
	bdf/hr		(lb/bdf)								
Inline Cutting Saws (EU3)	105,000	PM	1.32E-03	Mass Bal	0.00%	607.07	607.07	0.00	0.00	221.21	0.00
	bdf/hr	PM-10	1.32E-03	Mass Bal	0.00%						
		VOC	4.81E-04	Stack Test	0.00%						
			(lb/bdf)								
Foot Slicer (FS)	640	PM	0.00E+00	Mass Bal	0.00%	0.000	0.000	0.00	0.00	0.589	0.00
	bdf/hr	PM-10	0.00E+00	Mass Bal	0.00%						
		VOC	2.10E-04	Mass Bal	0.00%						
			(lb/bdf)								
Panel Saw (PS)	640	PM	2.85E-03	Mass Bal	0.00%	7.989	7.989	0.00	0.00	0.589	0.00
	bdf/hr	PM-10	2.85E-03	Mass Bal	0.00%						
		VOC	2.10E-04	Mass Bal	0.00%						
			(lb/bdf)								
Warehouse Area (EU4)	105,000	VOC	7.71E-06	Mass Bal	0.00%	0.00	0.00	0.00	0.00	3.55	0.00
	bdf/hr		(lb/bdf)								
Waste Recycling (EU5)	11,520	PM	1.67E-03	Mass Bal	0.00%	84.264	84.264	0.00	0.00	469.256	0.00
	bdf/hr	PM-10	1.67E-03	Mass Bal	0.00%						
		VOC	9.30E-03	Mass Bal	0.00%						
			(lb/bdf)								
Insignificant Activities						1.75	1.75	0.00	0.00	1.00	0.00
TOTAL						701.07	701.07	0.000	0.00	727.83	0.00

METHODOLOGY

Emissions = Max Capacity x Emission Factor x (1 - Control Efficiency)

Emission factors are from Mass Balance calculations submitted by the applicant, or are from actual stack tests performed at the source in February of 2003.

Appendix A: Emission Calculations
Emission Calculations

Company Name: Johns Manville
Address City IN Zip: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP: 099-17832
Plt ID: 099-00042
Permit Reviewer: Edward A. Longenberger
Date: August 15, 2003

Controlled Potential Emissions, After Throughput Limits

Emission Unit	Max Capacity	Pollutant	Emission Factor	Source of Emission Factor	Control Efficiency %	PM (tons/yr)	PM-10 (tons/yr)	SOx (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)
Foam Head (EU1)	678,356,560	VOC	2.27E-05	Stack Test	0.00%	0.00	0.00	0.00	0.00	7.70	0.00
	bdf/year		(lb/bdf)								
Foaming Laminator (EU2)	678,356,560	VOC	4.61E-05	Stack Test	0.00%	0.00	0.00	0.00	0.00	15.64	0.00
	bdf/year		(lb/bdf)								
Inline Cutting Saws (EU3)	678,356,560	PM	1.32E-03	Mass Bal	99.00%	4.48	4.48	0.00	0.00	16.31	0.00
	bdf/year	PM-10	1.32E-03	Mass Bal	99.00%						
		VOC	4.81E-04	Stack Test	90.00%						
			(lb/bdf)								
Foot Slicer (FS)	640	PM	0.00E+00	Mass Bal	99.00%	0.000	0.000	0.00	0.00	0.589	0.00
	bdf/hr	PM-10	0.00E+00	Mass Bal	99.00%						
		VOC	2.10E-04	Mass Bal	0.00%						
			(lb/bdf)								
Panel Saw (PS)	640	PM	2.85E-03	Mass Bal	99.00%	0.080	0.080	0.00	0.00	0.589	0.00
	bdf/hr	PM-10	2.85E-03	Mass Bal	99.00%						
		VOC	2.10E-04	Mass Bal	0.00%						
			(lb/bdf)								
Warehouse Area (EU4)	678,356,560	VOC	7.71E-06	Mass Bal	0.00%	0.00	0.00	0.00	0.00	2.62	0.00
	bdf/year		(lb/bdf)								
Waste Recycling (EU5)	1,000,000	PM*	1.67E-03	Mass Bal	99.00%	0.835	0.835	0.00	0.00	4.65	0.00
	bdf/year	PM-10*	1.67E-03	Mass Bal	99.00%						
		VOC	9.30E-03	Mass Bal	0.00%						
			(lb/bdf)								
Existing Insignificant Activities						1.75	1.75	0.00	0.00	1.00	0.00
TOTAL						7.14	7.14	0.00	0.00	49.09	0.00

METHODOLOGY

* Control efficiency is incorporated into the emission factors
Emissions = Max Capacity x Emission Factor x (1 - Control Efficiency)