



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: January 5, 2009
RE: Rieter Automotive North / 089 - 17994 - 00013
FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

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

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

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

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

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

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

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Rieter Automotive North America, Inc.
101 W Oakley Ave.
Lowell, Indiana 46356-2206**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions

Operation Permit No.: 089-17994-00013	
Issued by:  Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: January 5, 2009 Expiration Date: January 5, 2014

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary automotive sound deadening products manufacturing plant.

Source Address:	101 W Oakley Ave., Lowell, Indiana 46356-2206
Mailing Address:	101 W Oakley Ave., Lowell, Indiana 46356-2206
General Source Phone Number:	(219) 696-5100
SIC Code:	3714
County Location:	Lake
Source Location Status:	Nonattainment for 8-hour ozone standard Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) foam department/service parts (identified as Dept. 48) constructed prior to 1978 unless otherwise specified, with a maximum capacity of 2,794 pounds of trimmed parts and scrap per hour, consisting of:
 - (1) One (1) hot molding press (identified as HAM 12-press) used for servicing parts with a maximum throughput rate of 64.5 pounds of foam per hour.
 - (2) Two (2) natural gas-fired indirect-fired process heaters (identified as FCU-13 and FCU-14) in the foam department, each with a maximum heat input capacity of 6.0 MMBtu per hour. These units were, installed in 1990.
- (b) One (1) 52 North Cell department, with a maximum capacity of 369 pounds of trimmed parts and scrap per hour and consisting of one (1) mold press (identified as Cell 52), with a maximum capacity of 622 pounds of pads and 10.2 pounds of DOW film per hour, and exhausting at stack HV-1. This press was installed in 1978.
- (c) One (1) CJ line with a maximum capacity of 2,800 pounds of trimmed parts and scrap per hour, exhausting at stack FCU-15, that can be used to mold either fully cured pad with barriers with maximum throughput of 2,791 pounds per hour or to mold foam pad with damper with maximum throughput of 1,277 pounds per hour. The CJ line is supported by one (1) natural gas-fired CJ oven (identified as FCU-15), with a maximum heat input capacity of 2.5 MMBtu per hour. This line was constructed in 1991.

- (d) One (1) foam part cell, also known as Foam Cell Injection Molding, constructed in 1998, with a maximum capacity of 4,273 pounds of trimmed parts and scrap per hour, and consisting of the following equipment:
 - (1) Two (2) chemical storage tanks, each with an 8,000 gallon storage capacity;
 - (2) One (1) metering system;
 - (3) One (1) robotic injector; and
 - (4) One (1) nitrogen blanket system for chemical storage tanks.

- (e) Line 2, constructed in 1970 and modified in 1996 unless specified otherwise, with a maximum capacity of 3,744 pounds of saturated felt parts and trim scrap per hour, exhausting at stack SV-1, and consisting of the following equipment:
 - (1) One (1) asphalt saturator with a maximum capacity of 15,900 square feet of damper per hour.
 - (2) One (1) coater #1 with a maximum capacity of 15,900 square feet of damper per hour and 63.6 gallons of flexcryl per hour.
 - (3) One (1) coater #2 with a maximum capacity of 15,900 square feet of damper per hour and 31.8 gallons of filler glue per hour.
 - (4) One (1) natural gas-fired oil heater (identified as FCU-10) with a maximum heat input capacity of 4.80 MMBtu per hour. This unit was installed prior to 1983.

- (f) Lines 6 and 7 – bulk handling operations, constructed in the 1960s, and modified in 1983 and 1997, with a maximum capacity of 13,200 pounds of products per hour, using twelve (12) baghouses as controls, exhausting to twelve (12) stacks (BH-1, BH-2, BH-3, BH-4, BH-5, BH-6, BH-7, BH-8, BH-9, BH-10, BH-11 and BH-12), and consisting of the following equipment:
 - (1) One (1) natural gas-fired pre-dryer infrared oven with a maximum heat input capacity of 0.307 MMBtu per hour.
 - (2) One (1) reverse roll coater with a maximum capacity of 21,750 square feet of barrier and damper sheet (filled asphaltic sheet) per hour, and used in conjunction with Line 6.
 - (3) One (1) bag dump station controlled by a baghouse BH-12.
 - (4) Nine (9) pneumatically loaded silos (#9 through #17) with a combined maximum capacity of 46,945 pounds per hour.
 - (5) One (1) vacuum receiver with a maximum throughput rate of 108 pounds per hour, and used in conjunction with Line 6.
 - (6) One (1) calcium oxide bag dump station, controlled by a baghouse BH-11.
 - (7) Two (2) reverse roll coaters with a maximum capacity of 13,050 square feet of barrier sheet (filled asphaltic sheet) per hour, and used in conjunction with Line 7.
 - (8) One (1) natural gas-fired oil heater (identified as FCU-11) with a maximum heat input capacity of 4.80 MMBtu per hour. This unit was installed prior to 1983.

- (g) Line 8 – granular material handling operations, constructed in 1989 unless specified otherwise, with a maximum capacity of 14,000 pounds of products per hour, using thirteen (13) baghouses as controls, exhausting at thirteen (13) stacks (BH-13, BH-14, BH-15, BH-16, BH-17, BH-18, BH-19, BH-20, BH-21, BH-22, BH-23, BH-24 and BH-25) and consisting of the following equipment:
- (1) Two (2) bag dump stations:
 - (A) One (1) bag dump station with a maximum capacity of 4,000 pounds per hour.
 - (B) One (1) calcium oxide bag dump station with a maximum capacity of 108 pounds per hour.
 - (2) One (1) vacuum receiver with a maximum throughput rate of 108 pounds per hour.
 - (3) Ten (10) storage silos with combined capacity of 53,914 pounds per hour.
 - (4) One (1) anti-block coater with maximum throughput rate of 36,000 square feet of barrier and damper sheet (filled asphaltic sheet) per hour.
 - (5) One (1) natural gas-fired oil heater (identified as FCU-12), with a maximum heat input capacity of 6.0 MMBtu per hour. This unit was installed in 1991.
- (h) Line 92 (identified as L92), constructed in 1966 unless specified otherwise, with a maximum capacity of 3,280 pounds of products per hour, using three (3) baghouses exhausting at stack FCU-4, and consisting of the following equipment:
- (1) One (1) natural gas-fired boiler (identified as NAVA) with a maximum heat input capacity of 11.20 MMBtu per hour. This boiler was installed in 1995. Under the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units NSPS (40 CFR 60, Subpart Dc) the boiler is considered a steam generating unit.
 - (2) One (1) natural gas-fired oven with a maximum heat input capacity of 0.5 MMBtu per hour.
 - (3) One (1) natural gas-fired oven with a maximum heat input capacity of 0.5 MMBtu per hour, used for drying moisture from the padding. This oven was installed in 2004.
- (i) One (1) storage tank area (identified as VOLS), with a maximum capacity of 227,200 gallons of organic liquid, and consisting of the following equipment:
- (1) One (1) fixed roof dome tank (identified as Line 8 (Flux)) with a maximum storage capacity of 30,000 gallons. This unit was installed in 1989.
 - (2) One (1) fixed roof dome tank (identified as Line 8 (Coating)) with a maximum storage capacity of 30,000 gallons. This unit was installed in 1989.
 - (3) One (1) fixed roof dome tank (identified as Line 8 (B-25)) with a maximum storage capacity of 30,000 gallons. This unit was installed in 1989.

- (4) One (1) fixed roof dome tank (identified as Line 8 Latex #1) storing Latex, with a maximum storage capacity of 3,700 gallons. This unit was installed in 1989.
- (5) One (1) fixed roof dome tank (identified as Line 8 Latex #2) storing Latex, with a maximum storage capacity of 3,700 gallons. This unit was installed in 1989.
- (6) One (1) fixed roof dome tank (identified as Process Oil) storing process oil, with a maximum storage capacity of 13,500 gallons. This unit was installed prior to 1970.
- (7) One (1) fixed roof dome tank (identified as Antifreeze #1) storing antifreeze, with a maximum storage capacity of 1,128 gallons. This unit was installed in 1990.
- (8) One (1) fixed roof dome tank (identified as Antifreeze #2) storing antifreeze, with a maximum storage capacity of 1,128 gallons. This unit was installed in 1990.
- (9) One (1) fixed roof dome tank (identified as Line 6 & 7 (Flux)) with a maximum storage capacity of 30,455 gallons. This unit was installed in 1976.
- (10) One (1) fixed roof dome tank (identified as Line 6 & 7 (Coating)) with a maximum storage capacity of 30,455 gallons. This unit was installed in 1976.
- (11) One (1) fixed roof dome tank (identified as Line 6 & 7 (B-25)) with a maximum storage capacity of 30,455 gallons. This unit was installed in 1976.
- (12) One (1) fixed roof dome tank (identified as Waste Oil) storing waste oil, with a maximum storage capacity of 2,970 gallons. This unit was installed in 1986.
- (13) One (1) fixed roof dome tank (identified as HT Oil) storing heat transfer oil, with a maximum storage capacity of 1,128 gallons. This unit was installed in 1990.
- (14) One (1) fixed roof dome tank (identified as Lube Oil) storing lube oil, with a maximum storage capacity of 1,128 gallons. This unit was installed in 1990.
- (15) One (1) fixed roof dome tank (identified as Line 6 & 7 (Latex)) storing Latex, with a maximum storage capacity of 3,700 gallons. This unit was installed in 1976.
- (16) One (1) natural gas-fired asphalt tank heater (identified as FCU-6) with a maximum heat input capacity of 3.0 MMBtu per hour.
- (17) One (1) natural gas-fired asphalt tank heater (identified as FCU-7) with a maximum heat input capacity of 3.0 MMBtu per hour.
- (18) One (1) natural gas-fired asphalt tank heater (identified as FCU-8) with a maximum heat input capacity of 3.0 MMBtu per hour.
- (j) One (1) natural gas-fired 350 HP, constructed after 1989, identified as the VAPOR Circulate steam generator, with a maximum heat input capacity of 14.3 MMBtu per hour. Under the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units NSPS (40 CFR 60, Subpart Dc) the boiler is considered a steam generating unit.
- (k) One (1) barrier/foam recovery process line, processing 2,000 pounds per hour of foam trim scrap. This line was installed in 2000 and consists of the following:
 - (1) Two (2) grinders.

- (2) Four (4) process cyclones. These cyclones exhaust indoors.
- (3) Four (4) process collectors.
- (4) Two (2) multi-stage aspirators, five (5) fans and a conveying system.
- (5) One (1) baghouse to control the particulate matter emissions. The baghouse exhausts indoors.

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

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

- (a) One (1) natural gas-fired boiler (identified as FCU-5) with a maximum heat input capacity of 8.38 MMBtu per hour. This unit was installed prior to 1983 [326 IAC 6.8-1-2].
- (b) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than or equal to 12,000 gallons [326 IAC 8-9].
- (c) Fifty-two (52) natural gas-fired space heaters and four (4) air makeup units with a combined maximum heat input capacity of 54.75 MMBtu per hour, each unit with a heat capacity less than ten (10) MMBtu per hour [326 IAC 6.8-1-2].
- (d) VOC and HAP vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids [326 IAC 8-9].
- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6.8-1-2].
- (f) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (g) Two (2) #1 diesel fuel storage tanks, with a maximum capacity of 275 and 285 gallons, respectively [326 IAC 8-9].

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

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

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

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, 089-17994-00013, 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, including any permit shield provided in 326 IAC 2-7-15, 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 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

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

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

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

-
- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
 - (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) 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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865
Northwest Regional Office phone: (219) 757-0265; fax: (219) 757-0267.

- (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
MC 61-53 IGCN 1003
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 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) 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 2-7-4(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to 089-17994-00013 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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 not need to be included in this report.

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

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) 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) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

B.19 Permit Revision Under Economic Incentives and Other Programs
[326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the 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
MC 61-53 IGCN 1003
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 2-7-20(b),(c), or (e). 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 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade 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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) 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.21 Source Modification Requirement [326 IAC 2-7-10.5]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-3.

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][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

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

C.1 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 twenty percent (20%) 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.2 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.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

C.4 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 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. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.6 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
MC 61-52 IGCN 1003
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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.7 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
MC 61-53 IGCN 1003
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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, 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.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

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

C.10 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.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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 2-7-5][326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on September 12, 1999.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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; and/or
 - (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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), the Permittee shall submit by July 1 an emission statement covering the previous calendar year as follows:
 - (1) starting in 2004 and every three (3) years thereafter, and
 - (2) any year not already required under (1) if the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.
- (b) The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (c) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
[326 IAC 2-2][326 IAC 2-3]

- (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) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
 - (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-3]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

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 2-7-5(15)]

- (a) One (1) foam department/service parts (identified as Dept. 48) constructed prior to 1978 unless otherwise specified, with a maximum capacity of 2,794 pounds of trimmed parts and scrap per hour, consisting of:
- (1) One (1) hot molding press (identified as HAM 12-press) used for servicing parts with a maximum throughput rate of 64.5 pounds of foam per hour.
 - (2) Two (2) natural gas-fired indirect-fired process heaters (identified as FCU-13 and FCU-14) in the foam department, each with a maximum heat input capacity of 6.0 MMBtu per hour. These units were, installed in 1990.
- (b) One (1) 52 North Cell department, with a maximum capacity of 369 pounds of trimmed parts and scrap per hour and consisting of one (1) mold press (identified as Cell 52), with a maximum capacity of 622 pounds of pads and 10.2 pounds of DOW film per hour, and exhausting at stack HV-1. This press was installed in 1978.
- (c) One (1) CJ line with a maximum capacity of 2,800 pounds of trimmed parts and scrap per hour, exhausting at stack FCU-15, that can be used to mold either fully cured pad with barriers with maximum throughput of 2,791 pounds per hour or to mold foam pad with damper with maximum throughput of 1,277 pounds per hour. The CJ line is supported by one (1) natural gas-fired CJ oven (identified as FCU-15), with a maximum heat input capacity of 2.5 MMBtu per hour. This line was constructed in 1991.
- (d) One (1) foam part cell, also known as Foam Cell Injection Molding, constructed in 1998, with a maximum capacity of 4,273 pounds of trimmed parts and scrap per hour, and consisting of the following equipment:
- (1) Two (2) chemical storage tanks, each with an 8,000 gallon storage capacity;
 - (2) One (1) metering system;
 - (3) One (1) robotic injector; and
 - (4) One (1) nitrogen blanket system for chemical storage tanks.

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

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

D.1.1 Particulate [326 IAC 6.8]

- (a) Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), the particulate emissions from the one (1) foam department/service parts, one (1) 52 North Cell Department, and one (1) CJ line, shall be limited to 0.03 gr/dscf.
- (b) Pursuant to 326 IAC 6.8-1-2(b)(3), the particulate matter content of natural gas burned in the two (2) process heaters (identified as FCU-13 and FCU-14), each with a maximum heat input capacity of 6.0 MMBtu per hour shall be limited to 0.01 grains per dry standard cubic foot.

D.1.2 Site Specific Reasonably Available Control Technology [326 IAC 8-7-3(3)]

Pursuant to Significant Permit Modification no. 089-12599-00013, issued November 18, 2002, the Permittee shall comply with the requirements of 326 IAC 8-7-3(3) for one (1) CJ Line as shown below:

- (a) The VOC emissions shall not exceed 0.198 pounds of VOC per ton of production, and the total production shall not exceed 12,121 tons per twelve (12) consecutive month period with compliance determined at the end of each month; and
- (b) The equipment shall be operated in an efficient manner.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.3 Visible Emissions Notations

- (a) Daily visible emission notations of the foam department/service parts stack exhausts shall be performed during normal daylight operations. 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) 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.

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

D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain monthly records of total production from the one (1) CJ line.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records of daily visible emission notations of the foam department/service parts stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30)

days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (e) Line 2, constructed in 1970 and modified in 1996 unless specified otherwise, with a maximum capacity of 3,744 pounds of saturated felt parts and trim scrap per hour, exhausting at stack SV-1, and consisting of the following equipment:
- (1) One (1) asphalt saturator with a maximum capacity of 15,900 square feet of damper per hour.
 - (2) One (1) coater #1 with a maximum capacity of 15,900 square feet of damper per hour and 63.6 gallons of flexcryl per hour.
 - (3) One (1) coater #2 with a maximum capacity of 15,900 square feet of damper per hour and 31.8 gallons of filler glue per hour.
 - (4) One (1) natural gas-fired oil heater (identified as FCU-10) with a maximum heat input capacity of 4.80 MMBtu per hour. This unit was installed prior to 1983.

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

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

D.2.1 Particulate [326 IAC 6.8]

-
- (a) Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), the particulate emissions from Line 2 shall be limited to 0.03 gr/dscf.
 - (b) Pursuant to 326 IAC 6.8-1-2(b)(3), the particulate matter content of natural gas burned in the Line 2 oil heater (identified as FCU-10), with a maximum heat input capacity of 4.80 MMBtu per hour shall be limited to 0.01 grains per dry standard cubic foot.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (f) Lines 6 and 7 – bulk handling operations, constructed in the 1960s, and modified in 1983 and 1997, with a maximum capacity of 13,200 pounds of products per hour, using twelve (12) baghouses as controls, exhausting to twelve (12) stacks (BH-1, BH-2, BH-3, BH-4, BH-5, BH-6, BH-7, BH-8, BH-9, BH-10, BH-11 and BH-12), and consisting of the following equipment:
- (1) One (1) natural gas-fired pre-dryer infrared oven with a maximum heat input capacity of 0.307 MMBtu per hour.
 - (2) One (1) reverse roll coater with a maximum capacity of 21,750 square feet of barrier and damper sheet (filled asphaltic sheet) per hour, and used in conjunction with Line 6.
 - (3) One (1) bag dump station controlled by a baghouse BH-12.
 - (4) Nine (9) pneumatically loaded silos (#9 through #17) with a combined maximum capacity of 46,945 pounds per hour.
 - (5) One (1) vacuum receiver with a maximum throughput rate of 108 pounds per hour, and used in conjunction with Line 6.
 - (6) One (1) calcium oxide bag dump station, controlled by a baghouse BH-11.
 - (7) Two (2) reverse roll coaters with a maximum capacity of 13,050 square feet of barrier sheet (filled asphaltic sheet) per hour, and used in conjunction with Line 7.
 - (8) One (1) natural gas-fired oil heater (identified as FCU-11) with a maximum heat input capacity of 4.80 MMBtu per hour. This unit was installed prior to 1983.

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

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

D.3.1 Particulate [326 IAC 6.8]

- (a) Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), the particulate emissions from the bulk handling operations in Lines 6 & 7 shall be limited to 0.03 gr/dscf.
- (b) Pursuant to 326 IAC 6.8-1-2(b)(3), the particulate matter content of natural gas burned in the Line 6 & 7 oil heater (identified as FCU-11), with a maximum heat input capacity of 4.80 MMBtu per hour shall be limited to 0.01 grains per dry standard cubic foot.

Compliance Determination Requirements

D.3.2 Particulate Control

In order to comply with D.3.1(a) the twelve (12) baghouses for particulate control shall be in operation and control emissions from the bulk handling operations in Line 6 & 7 at all times that the bulk handling operations in Line 6 & 7 are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.3 Visible Emissions Notations

- (a) Daily visible emission notations of the Line 6 and 7 stack exhausts shall be performed during normal daylight operations. 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) 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.

D.3.4 Broken or Failed Bag Detection

- (a) For a single compartment baghouses 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 have 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.

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

D.3.5 Record Keeping Requirements

- (a) To document compliance with Condition D.3.3, the Permittee shall maintain records of daily visible emission notations of the Lines 6 and 7 stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (g) Line 8 – granular material handling operations, constructed in 1989 unless specified otherwise, with a maximum capacity of 14,000 pounds of products per hour, using thirteen (13) baghouses as controls, exhausting at thirteen (13) stacks (BH-13, BH-14, BH-15, BH-16, BH-17, BH-18, BH-19, BH-20, BH-21, BH-22, BH-23, BH-24 and BH-25) and consisting of the following equipment:
- (1) Two (2) bag dump stations:
 - (A) One (1) bag dump station with a maximum capacity of 4,000 pounds per hour.
 - (B) One (1) calcium oxide bag dump station with a maximum capacity of 108 pounds per hour.
 - (2) One (1) vacuum receiver with a maximum throughput rate of 108 pounds per hour.
 - (3) Ten (10) storage silos with combined capacity of 53,914 pounds per hour.
 - (4) One (1) anti-block coater with maximum throughput rate of 36,000 square feet of barrier and damper sheet (filled asphaltic sheet) per hour.
 - (5) One (1) natural gas-fired oil heater (identified as FCU-12), with a maximum heat input capacity of 6.0 MMBtu per hour. This unit was installed in 1991.

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

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

D.4.1 Particulate [326 IAC 6.8]

- (a) Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), the particulate emissions from the granular material handling operations in Line 8 shall be limited to 0.03 gr/dscf.
- (b) Pursuant to 326 IAC 6.8-1-2(b)(3), the particulate matter content of natural gas burned in the Line 8 oil heater (identified as FCU-12), with a maximum heat input capacity of 6.0 MMBtu per hour shall be limited to 0.01 grains per dry standard cubic foot.

Compliance Determination Requirements

D.4.2 Particulate Control

In order to comply with D.4.1(a) the thirteen (13) baghouses for particulate control shall be in operation and control emissions from the granular material handling operations in Line 8 at all times that the granular material handling operations in Line 8 are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.3 Visible Emissions Notations

- (a) Daily visible emission notations of the Line 8 stack exhausts shall be performed during normal daylight operations. 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) 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.

D.4.4 Broken or Failed Bag Detection

- (a) For a single compartment baghouses 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 have 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.

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

D.4.5 Record Keeping Requirements

- (a) To document compliance with Condition D.4.3, the Permittee shall maintain records of daily visible emission notations of the Line 8 stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5

FACILITY OPERATION CONDITIONS

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

- (h) Line 92 (identified as L92), constructed in 1966 unless specified otherwise, with a maximum capacity of 3,280 pounds of products per hour, using three (3) baghouses exhausting at stack FCU-4, and consisting of the following equipment:
- (1) One (1) natural gas-fired boiler (identified as NAVA) with a maximum heat input capacity of 11.20 MMBtu per hour. This boiler was installed in 1995. Under the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units NSPS (40 CFR 60, Subpart Dc) the boiler is considered a steam generating unit.
 - (2) One (1) natural gas-fired oven with a maximum heat input capacity of 0.5 MMBtu per hour.
 - (3) One (1) natural gas-fired oven with a maximum heat input capacity of 0.5 MMBtu per hour, used for drying moisture from the padding. This oven was installed in 2004.

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

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

D.5.1 Particulate [326 IAC 6.8]

- (a) Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), the particulate emissions from Line 92 shall be limited to 0.03 gr/dscf.
- (b) Pursuant to 326 IAC 6.8-1-2(b)(3), the particulate matter emissions from natural gas burned in the Line 92 boiler (identified as NAVA), with a maximum heat input capacity of 11.2 MMBtu per hour shall be limited to 0.01 grains per dry standard cubic foot (dscf).

D.5.2 Volatile Organic Compound (VOC) [326 IAC 8-7-3]

Pursuant to First Significant Permit Modification no. 089-15455-00013, issued July 30, 2002, the Permittee shall comply with the requirements of 326 IAC 8-7-3 for the one (1) Line 92 as shown below: The VOC emissions from Line 92 shall not exceed 1.50 pounds per ton of production, and the total production shall not exceed 15,500 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

D.5.3 Volatile Organic Compound (VOC) [326 IAC 2-3]

Pursuant to 326 IAC 2-3, the VOC emissions from Line 92 shall not exceed 15.6 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limit shall limit VOC emissions during the five year contemporaneous period, 1997 through 2002, to less than 25 tons per year and render 326 IAC 2-3 (Emission Offset) not applicable.

D.5.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.5.5 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

Pursuant to first Significant Permit Modification No. 089-15455-00013, issued July 30, 2002, the Permittee shall perform VOC testing on Line 92 on or before December 3, 2009 utilizing a method acceptable to IDEM, OAQ. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.5.6 Particulate Control

In order to comply with D.5.1(a) the three (3) baghouses for particulate control shall be in operation and control emissions from Line 92 at all times that Line 92 is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.7 Visible Emissions Notations

- (a) Daily visible emission notations of the Line 92 stack exhausts shall be performed during normal daylight operations. 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) 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.

D.5.8 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse used in conjunction with Line 92, at least once per week when the line is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 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 and 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.

D.5.9 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 have 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.

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

D.5.10 Record Keeping Requirements

- (a) To document compliance with Condition D.5.2 and D.5.3, the Permittee shall keep monthly records of total production from Line 92.
- (b) To document compliance with Condition D.5.7, the Permittee shall maintain records of daily visible emission notations of the Line 92 stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (c) To document compliance with Condition D.5.8, the Permittee shall maintain daily records of the pressure drop. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.5.2 and D.5.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

D.5.12 General Provisions Relating to NSPS Dc [326 IAC 12] [40 CFR Part 60 Subpart A]

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1 for the NAVA and the VAPOR Circulate steam generator, except as otherwise specified in 40 CFR Part 60, Subpart Dc.
- (b) Pursuant to 40 CFR 60.19, the Permittee shall submit all required notifications and reports to:

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

D.5.13 Emissions From Small Industrial-Commercial-Institutional Steam Generating Units NSPS [40
CFR Part 60, Subpart Dc] [326 IAC 12]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart Dc (included
as Attachment A of this permit):

- (1) 40 CFR Part 60.40c
- (2) 40 CFR Part 60.41c
- (3) 40 CFR Part 60.48c(a), (f), (g)

SECTION D.6

FACILITY OPERATION CONDITIONS

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

- (d) One (1) foam part cell, also known as Foam Cell Injection Molding, constructed in 1998, with a maximum capacity of 4,273 pounds of trimmed parts and scrap per hour, and consisting of the following equipment:
 - (1) Two (2) chemical storage tanks, each with an 8,000 gallon storage capacity;
- (i) One (1) storage tank area (identified as VOLS), with a maximum capacity of 227,200 gallons of organic liquid, and consisting of the following equipment:
 - (1) One (1) fixed roof dome tank (identified as Line 8 (Flux)) with a maximum storage capacity of 30,000 gallons. This unit was installed in 1989.
 - (2) One (1) fixed roof dome tank (identified as Line 8 (Coating)) with a maximum storage capacity of 30,000 gallons. This unit was installed in 1989.
 - (3) One (1) fixed roof dome tank (identified as Line 8 (B-25)) with a maximum storage capacity of 30,000 gallons. This unit was installed in 1989.
 - (4) One (1) fixed roof dome tank (identified as Line 8 Latex #1) storing Latex, with a maximum storage capacity of 3,700 gallons. This unit was installed in 1989.
 - (5) One (1) fixed roof dome tank (identified as Line 8 Latex #2) storing Latex, with a maximum storage capacity of 3,700 gallons. This unit was installed in 1989.
 - (6) One (1) fixed roof dome tank (identified as Process Oil) storing process oil, with a maximum storage capacity of 13,500 gallons. This unit was installed prior to 1970.
 - (7) One (1) fixed roof dome tank (identified as Antifreeze #1) storing antifreeze, with a maximum storage capacity of 1,128 gallons. This unit was installed in 1990.
 - (8) One (1) fixed roof dome tank (identified as Antifreeze #2) storing antifreeze, with a maximum storage capacity of 1,128 gallons. This unit was installed in 1990.
 - (9) One (1) fixed roof dome tank (identified as Line 6 & 7 (Flux)) with a maximum storage capacity of 30,455 gallons. This unit was installed in 1976.
 - (10) One (1) fixed roof dome tank (identified as Line 6 & 7 (Coating)) with a maximum storage capacity of 30,455 gallons. This unit was installed in 1976.
 - (11) One (1) fixed roof dome tank (identified as Line 6 & 7 (B-25)) with a maximum storage capacity of 30,455 gallons. This unit was installed in 1976.
 - (12) One (1) fixed roof dome tank (identified as Waste Oil) storing waste oil, with a maximum storage capacity of 2,970 gallons. This unit was installed in 1986.
 - (13) One (1) fixed roof dome tank (identified as HT Oil) storing heat transfer oil, with a maximum storage capacity of 1,128 gallons. This unit was installed in 1990.
 - (14) One (1) fixed roof dome tank (identified as Lube Oil) storing lube oil, with a maximum storage capacity of 1,128 gallons. This unit was installed in 1990.

- (15) One (1) fixed roof dome tank (identified as Line 6 & 7 (Latex)) storing Latex, with a maximum storage capacity of 3,700 gallons. This unit was installed in 1976.
- (16) One (1) natural gas-fired asphalt tank heater (identified as FCU-6) with a maximum heat input capacity of 3.0 MMBtu per hour.
- (17) One (1) natural gas-fired asphalt tank heater (identified as FCU-7) with a maximum heat input capacity of 3.0 MMBtu per hour.
- (18) One (1) natural gas-fired asphalt tank heater (identified as FCU-8) with a maximum heat input capacity of 3.0 MMBtu per hour.

Insignificant Activities:

- (b) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than or equal to 12,000 gallons [326 IAC 8-9].
- (d) VOC and HAP vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids [326 IAC 8-9].
- (n) Two (2) #1 diesel fuel storage tanks, with a maximum capacity of 275 and 285 gallons, respectively [326 IAC 8-9].

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

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

D.6.1 Particulate [326 IAC 6.8]

Pursuant to 326 IAC 6.8-1-2(b)(3), the particulate matter content of natural gas burned in the asphalt tank heaters (identified as FCU-06, FCU-07, and FCU-08), each with a maximum heat input capacity of 3.0 MMBtu per hour shall be limited to 0.01 grains per dry standard cubic foot (dscf).

D.6.2 Volatile Organic Compounds (VOC) [326 IAC 8-9-1]

Pursuant to 326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels), the Permittee shall maintain a record and submit to IDEM, OAQ a report containing the following information for the seventeen (17) fixed roof dome tanks and the VOC/HAP storage tanks (listed in Insignificant Activities):

- (1) The vessel identification;
- (2) The vessel dimensions; and
- (3) The vessel capacity.

These records shall be maintained for the life of the source.

SECTION D.7

FACILITY OPERATION CONDITIONS

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

- (j) One (1) natural gas-fired 350 HP, constructed after 1989, identified as the VAPOR Circulate steam generator, with a maximum heat input capacity of 14.3 MMBtu per hour. Under the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units NSPS (40 CFR 60, Subpart Dc) the boiler is considered a steam generating unit.

Insignificant Activities:

- (a) One (1) natural gas-fired boiler (identified as FCU-5) with a maximum heat input capacity of 8.38 MMBtu per hour. This unit was installed prior to 1983 [326 IAC 6.8-1-2].
- (c) Fifty-two (52) natural gas-fired space heaters and four (4) air makeup units with a combined maximum heat input capacity of 54.75 MMBtu per hour, each unit with a heat capacity less than ten (10) MMBtu per hour [326 IAC 6.8-1-2].

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

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

D.7.1 Particulate [326 IAC 6.8]

- (a) Pursuant to 326 IAC 6.8-1-2(b)(3) (Nonattainment Area Limitations), the particulate matter content of natural gas burned in the boiler (identified as VAPOR Circulate Steam Generator), with a maximum heat input capacity of 14.3 MMBtu per hour shall be limited to 0.01 grains per dry standard cubic foot.
- (b) Pursuant to 326 IAC 6.8-1-2(b)(3) (Nonattainment Area Limitations), the particulate matter content of natural gas burned in the 8.38 MMBtu per hour boiler (identified as FCU-5), listed under Insignificant Activities, shall be limited to 0.01 grains per dry standard cubic foot.
- (c) Pursuant to 326 IAC 6.8-1-2(b)(3), the particulate matter content of natural gas burned in the fifty-two (52) natural gas-fired space heaters shall be limited to 0.01 grains per dry standard cubic foot (dscf).

SECTION D.8

FACILITY OPERATION CONDITIONS

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

- (k) One (1) barrier/foam recovery process line, processing 2,000 pounds per hour of foam trim scrap. This line was installed in 2000 and consists of the following:
- (1) Two (2) grinders.
 - (2) Four (4) process cyclones.
 - (3) Four (4) process collectors.
 - (4) Two (2) multi-stage aspirators, five (5) fans and a conveying system.
 - (5) One (1) baghouse to control the particulate matter emissions.

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

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

D.8.1 Particulate [326 IAC 6.8]

Pursuant to 326 IAC 6.8 (Particulate Matter Limitations for Lake County), the particulate emissions from the one (1) barrier/foam recovery process line shall be limited to 0.03 grains per dry standard cubic foot. This limit is equivalent to a potential to emit of 1.93 pounds of particulate per hour.

Compliance Determination Requirements

D.8.2 Particulate Control

In order to comply with D.8.1, the one (1) baghouse for particulate control shall be in operation and control emissions from the barrier/foam recovery process line at all times that the barrier/foam recovery process line is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.8.3 Broken or Failed Bag Detection

- (a) For a single compartment baghouses 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 have 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.

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

D.8.5 Record Keeping Requirements

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

SECTION D.9

FACILITY OPERATION CONDITIONS

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

Insignificant Activities:

- (f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6.8-1-2].

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

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

D.9.1 Particulate [326 IAC 6.8]

Pursuant to 326 IAC 6.8 (Particulate Matter Limitations for Lake County), the particulate emissions from welding, brazing, and soldering equipment, cutting torches shall each not exceed 0.03 grains per dry standard cubic foot.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Reiter Automotive North America, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356
Part 70 Permit No.: T089-17994-00013

This certification shall be included when submitting monitoring, testing reports/results

or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Reiter Automotive North America, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356
Part 70 Permit No.: T089-17994-00013

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

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY

COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Reiter Automotive North America, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356
Part 70 Permit No.: T089-17994-00013
Facility: Line 92
Parameter: Total Production
Limit: Condition D.5.2: The VOC emissions from Line 92 shall not exceed 1.50 pounds per ton of production. The total production for Line 92 shall not exceed 15,500 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, respectively.
Condition D.5.3: The VOC emissions from Line 92 shall not exceed 15.6 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1 (This Month)		Column 2 (Previous 11 Months)		Column 1 + Column 2 (12 Months Total)	
	Tons of Product	Tons of VOC	Tons of Product	Tons of VOC	Tons of Product	Tons of VOC
Month 1						
Month 2						
Month 3						

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY

COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Reiter Automotive North America, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356
Part 70 Permit No.: T089-17994-00013
Facility: CJ Line
Parameter: Total production
Limit: The total production for CJ Line shall not exceed 12,121 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Reiter Automotive North America, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356
Part 70 Permit No.: T089-17994-00013

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

<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. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "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: _____

Attach a signed certification to complete this report.

ATTACHMENT A

**PART 60—STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES
Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional
Steam Generating Units**

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Rieter Automotive North America, Inc.
101 W Oakley Ave.
Lowell, Indiana 46356-2206
089-17994-00013**

Attachment A

Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Source: 72 FR 32759, June 13, 2007, unless otherwise noted.

§ 60.40c Applicability and delegation of authority.

(a) Except as provided in paragraph (d) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr).

(b) In delegating implementation and enforcement authority to a State under section 111(c) of the Clean Air Act, §60.48c(a)(4) shall be retained by the Administrator and not transferred to a State.

(c) Steam generating units that meet the applicability requirements in paragraph (a) of this section are not subject to the sulfur dioxide (SO₂) or particulate matter (PM) emission limits, performance testing requirements, or monitoring requirements under this subpart (§§60.42c, 60.43c, 60.44c, 60.45c, 60.46c, or 60.47c) during periods of combustion research, as defined in §60.41c.

(d) Any temporary change to an existing steam generating unit for the purpose of conducting combustion research is not considered a modification under §60.14.

(e) Heat recovery steam generators that are associated with combined cycle gas turbines and meet the applicability requirements of subpart GG or KKKK of this part are not subject to this subpart. This subpart will continue to apply to all other heat recovery steam generators that are capable of combusting more than or equal to 2.9 MW (10 MMBtu/hr) heat input of fossil fuel but less than or equal to 29 MW (100 MMBtu/hr) heat input of fossil fuel. If the heat recovery steam generator is subject to this subpart, only emissions resulting from combustion of fuels in the steam generating unit are subject to this subpart. (The gas turbine emissions are subject to subpart GG or KKKK, as applicable, of this part).

(f) Any facility covered by subpart AAAA of this part is not covered by this subpart.

(g) Any facility covered by an EPA approved State or Federal section 111(d)/129 plan implementing subpart BBBB of this part is not covered by this subpart.

§ 60.41c Definitions.

As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act and in subpart A of this part.

Annual capacity factor means the ratio between the actual heat input to a steam generating unit from an individual fuel or combination of fuels during a period of 12 consecutive calendar months and the potential heat input to the steam generating unit from all fuels had the steam generating unit been operated for 8,760 hours during that 12-month period at the maximum design heat input capacity. In the case of steam generating units that are rented or leased, the actual heat input shall be determined based on the combined heat input from all operations of the affected facility during a period of 12 consecutive calendar months.

Coal means all solid fuels classified as anthracite, bituminous, subbituminous, or lignite by the American Society of Testing and Materials in ASTM D388 (incorporated by reference, see §60.17), coal refuse, and petroleum coke. Coal-derived synthetic fuels derived from coal for the purposes of creating useful heat, including but not limited to solvent refined coal, gasified coal, coal-oil mixtures, and coal-water mixtures, are also included in this definition for the purposes of this subpart.

Coal refuse means any by-product of coal mining or coal cleaning operations with an ash content greater than 50 percent (by weight) and a heating value less than 13,900 kilojoules per kilogram (kJ/kg) (6,000 Btu per pound (Btu/lb) on a dry basis.

Cogeneration steam generating unit means a steam generating unit that simultaneously produces both electrical (or mechanical) and thermal energy from the same primary energy source.

Combined cycle system means a system in which a separate source (such as a stationary gas turbine, internal combustion engine, or kiln) provides exhaust gas to a steam generating unit.

Combustion research means the experimental firing of any fuel or combination of fuels in a steam generating unit for the purpose of conducting research and development of more efficient combustion or more effective prevention or control of air pollutant emissions from combustion, provided that, during these periods of research and development, the heat generated is not used for any purpose other than preheating combustion air for use by that steam generating unit (*i.e.* , the heat generated is released to the atmosphere without being used for space heating, process heating, driving pumps, preheating combustion air for other units, generating electricity, or any other purpose).

Conventional technology means wet flue gas desulfurization technology, dry flue gas desulfurization technology, atmospheric fluidized bed combustion technology, and oil hydrodesulfurization technology.

Distillate oil means fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396 (incorporated by reference, see §60.17).

Dry flue gas desulfurization technology means a SO₂control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline reagent and water, whether introduced separately or as a premixed slurry or solution and forming a dry powder material. This definition includes devices where the dry powder material is subsequently converted to another form. Alkaline reagents used in dry flue gas desulfurization systems include, but are not limited to, lime and sodium compounds.

Duct burner means a device that combusts fuel and that is placed in the exhaust duct from another source (such as a stationary gas turbine, internal combustion engine, kiln, etc.) to allow the firing of additional fuel to heat the exhaust gases before the exhaust gases enter a steam generating unit.

Emerging technology means any SO₂control system that is not defined as a conventional technology under this section, and for which the owner or operator of the affected facility has received approval from the Administrator to operate as an emerging technology under §60.48c(a)(4).

Federally enforceable means all limitations and conditions that are enforceable by the Administrator, including the requirements of 40 CFR parts 60 and 61, requirements within any applicable State implementation plan, and any permit requirements established under 40 CFR 52.21 or under 40 CFR 51.18 and 51.24.

Fluidized bed combustion technology means a device wherein fuel is distributed onto a bed (or series of beds) of limestone aggregate (or other sorbent materials) for combustion; and these materials are forced upward in the device by the flow of combustion air and the gaseous products of combustion. Fluidized bed combustion technology includes, but is not limited to, bubbling bed units and circulating bed units.

Fuel pretreatment means a process that removes a portion of the sulfur in a fuel before combustion of the fuel in a steam generating unit.

Heat input means heat derived from combustion of fuel in a steam generating unit and does not include the heat derived from preheated combustion air, recirculated flue gases, or exhaust gases from other sources (such as stationary gas turbines, internal combustion engines, and kilns).

Heat transfer medium means any material that is used to transfer heat from one point to another point.

Maximum design heat input capacity means the ability of a steam generating unit to combust a stated maximum amount of fuel (or combination of fuels) on a steady state basis as determined by the physical design and characteristics of the steam generating unit.

Natural gas means: (1) A naturally occurring mixture of hydrocarbon and nonhydrocarbon gases found in geologic formations beneath the earth's surface, of which the principal constituent is methane; or (2) liquefied petroleum (LP) gas, as defined by the American Society for Testing and Materials in ASTM D1835 (incorporated by reference, see §60.17).

Noncontinental area means the State of Hawaii, the Virgin Islands, Guam, American Samoa, the Commonwealth of Puerto Rico, or the Northern Mariana Islands.

Oil means crude oil or petroleum, or a liquid fuel derived from crude oil or petroleum, including distillate oil and residual oil.

Potential sulfur dioxide emission rate means the theoretical SO₂ emissions (nanograms per joule (ng/J) or lb/MMBtu heat input) that would result from combusting fuel in an uncleaned state and without using emission control systems.

Process heater means a device that is primarily used to heat a material to initiate or promote a chemical reaction in which the material participates as a reactant or catalyst.

Residual oil means crude oil, fuel oil that does not comply with the specifications under the definition of distillate oil, and all fuel oil numbers 4, 5, and 6, as defined by the American Society for Testing and Materials in ASTM D396 (incorporated by reference, see §60.17).

Steam generating unit means a device that combusts any fuel and produces steam or heats water or any other heat transfer medium. This term includes any duct burner that combusts fuel and is part of a combined cycle system. This term does not include process heaters as defined in this subpart.

Steam generating unit operating day means a 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time in the steam generating unit. It is not necessary for fuel to be combusted continuously for the entire 24-hour period.

Wet flue gas desulfurization technology means an SO₂ control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline slurry or solution and forming a liquid material. This definition includes devices where the liquid material is subsequently converted to another form. Alkaline reagents used in wet flue gas desulfurization systems include, but are not limited to, lime, limestone, and sodium compounds.

Wet scrubber system means any emission control device that mixes an aqueous stream or slurry with the exhaust gases from a steam generating unit to control emissions of PM or SO₂.

Wood means wood, wood residue, bark, or any derivative fuel or residue thereof, in any form, including but not limited to sawdust, sanderdust, wood chips, scraps, slabs, millings, shavings, and processed pellets made from wood or other forest residues.

§ 60.42c Standard for sulfur dioxide (SO₂).

(a) Except as provided in paragraphs (b), (c), and (e) of this section, on and after the date on which the performance test is completed or required to be completed under §60.8, whichever date comes first, the owner or operator of an affected facility that combusts only coal shall neither: cause to be discharged into the atmosphere from the affected facility any gases that contain SO₂ in excess of 87 ng/J (0.20 lb/MMBtu) heat input or 10 percent (0.10) of the potential SO₂ emission rate (90 percent reduction), nor cause to be

discharged into the atmosphere from the affected facility any gases that contain SO₂ in excess of 520 ng/J (1.2 lb/MMBtu) heat input. If coal is combusted with other fuels, the affected facility shall neither: cause to be discharged into the atmosphere from the affected facility any gases that contain SO₂ in excess of 87 ng/J (0.20 lb/MMBtu) heat input or 10 percent (0.10) of the potential SO₂ emission rate (90 percent reduction), nor cause to be discharged into the atmosphere from the affected facility any gases that contain SO₂ in excess of the emission limit is determined pursuant to paragraph (e)(2) of this section.

(b) Except as provided in paragraphs (c) and (e) of this section, on and after the date on which the performance test is completed or required to be completed under §60.8, whichever date comes first, the owner or operator of an affected facility that:

(1) Combusts only coal refuse alone in a fluidized bed combustion steam generating unit shall neither:

(i) Cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂ in excess of 87 ng/J (0.20 lb/MMBtu) heat input or 20 percent (0.20) of the potential SO₂ emission rate (80 percent reduction); nor

(ii) Cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂ in excess of 520 ng/J (1.2 lb/MMBtu) heat input. If coal is fired with coal refuse, the affected facility subject to paragraph (a) of this section. If oil or any other fuel (except coal) is fired with coal refuse, the affected facility is subject to the 87 ng/J (0.20 lb/MMBtu) heat input SO₂ emissions limit or the 90 percent SO₂ reduction requirement specified in paragraph (a) of this section and the emission limit is determined pursuant to paragraph (e)(2) of this section.

(2) Combusts only coal and that uses an emerging technology for the control of SO₂ emissions shall neither:

(i) Cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂ in excess of 50 percent (0.50) of the potential SO₂ emission rate (50 percent reduction); nor

(ii) Cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂ in excess of 260 ng/J (0.60 lb/MMBtu) heat input. If coal is combusted with other fuels, the affected facility is subject to the 50 percent SO₂ reduction requirement specified in this paragraph and the emission limit determined pursuant to paragraph (e)(2) of this section.

(c) On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that combusts coal, alone or in combination with any other fuel, and is listed in paragraphs (c)(1), (2), (3), or (4) of this section shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂ in excess of the emission limit determined pursuant to paragraph (e)(2) of this section. Percent reduction requirements are not applicable to affected facilities under paragraphs (c)(1), (2), (3), or (4).

(1) Affected facilities that have a heat input capacity of 22 MW (75 MMBtu/hr) or less.

(2) Affected facilities that have an annual capacity for coal of 55 percent (0.55) or less and are subject to a federally enforceable requirement limiting operation of the affected facility to an annual capacity factor for coal of 55 percent (0.55) or less.

(3) Affected facilities located in a noncontinental area.

(4) Affected facilities that combust coal in a duct burner as part of a combined cycle system where 30 percent (0.30) or less of the heat entering the steam generating unit is from combustion of coal in the duct burner and 70 percent (0.70) or more of the heat entering the steam generating unit is from exhaust gases entering the duct burner.

(d) On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that combusts oil shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂ in excess

of 215 ng/J (0.50 lb/MMBtu) heat input; or, as an alternative, no owner or operator of an affected facility that combusts oil shall combust oil in the affected facility that contains greater than 0.5 weight percent sulfur. The percent reduction requirements are not applicable to affected facilities under this paragraph.

(e) On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that combusts coal, oil, or coal and oil with any other fuel shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂ in excess of the following:

(1) The percent of potential SO₂ emission rate or numerical SO₂ emission rate required under paragraph (a) or (b)(2) of this section, as applicable, for any affected facility that

(i) Combusts coal in combination with any other fuel;

(ii) Has a heat input capacity greater than 22 MW (75 MMBtu/hr); and

(iii) Has an annual capacity factor for coal greater than 55 percent (0.55); and

(2) The emission limit determined according to the following formula for any affected facility that combusts coal, oil, or coal and oil with any other fuel:

$$E_s = \frac{(K_a H_a + K_b H_b + K_c H_c)}{(H_a + H_b + H_c)}$$

Where:

E_s = SO₂ emission limit, expressed in ng/J or lb/MMBtu heat input;

K_a = 520 ng/J (1.2 lb/MMBtu);

K_b = 260 ng/J (0.60 lb/MMBtu);

K_c = 215 ng/J (0.50 lb/MMBtu);

H_a = Heat input from the combustion of coal, except coal combusted in an affected facility subject to paragraph (b)(2) of this section, in Joules (J) [MMBtu];

H_b = Heat input from the combustion of coal in an affected facility subject to paragraph (b)(2) of this section, in J (MMBtu); and

H_c = Heat input from the combustion of oil, in J (MMBtu).

(f) Reduction in the potential SO₂ emission rate through fuel pretreatment is not credited toward the percent reduction requirement under paragraph (b)(2) of this section unless:

(1) Fuel pretreatment results in a 50 percent (0.50) or greater reduction in the potential SO₂ emission rate; and

(2) Emissions from the pretreated fuel (without either combustion or post-combustion SO₂ control) are equal to or less than the emission limits specified under paragraph (b)(2) of this section.

(g) Except as provided in paragraph (h) of this section, compliance with the percent reduction requirements, fuel oil sulfur limits, and emission limits of this section shall be determined on a 30-day rolling average basis.

(h) For affected facilities listed under paragraphs (h)(1), (2), or (3) of this section, compliance with the emission limits or fuel oil sulfur limits under this section may be determined based on a certification from the fuel supplier, as described under §60.48c(f), as applicable.

(1) Distillate oil-fired affected facilities with heat input capacities between 2.9 and 29 MW (10 and 100 MMBtu/hr).

(2) Residual oil-fired affected facilities with heat input capacities between 2.9 and 8.7 MW (10 and 30 MMBtu/hr).

(3) Coal-fired facilities with heat input capacities between 2.9 and 8.7 MW (10 and 30 MMBtu/hr).

(i) The SO₂ emission limits, fuel oil sulfur limits, and percent reduction requirements under this section apply at all times, including periods of startup, shutdown, and malfunction.

(j) Only the heat input supplied to the affected facility from the combustion of coal and oil is counted under this section. No credit is provided for the heat input to the affected facility from wood or other fuels or for heat derived from exhaust gases from other sources, such as stationary gas turbines, internal combustion engines, and kilns.

§ 60.43c Standard for particulate matter (PM).

(a) On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that commenced construction, reconstruction, or modification on or before February 28, 2005, that combusts coal or combusts mixtures of coal with other fuels and has a heat input capacity of 8.7 MW (30 MMBtu/hr) or greater, shall cause to be discharged into the atmosphere from that affected facility any gases that contain PM in excess of the following emission limits:

(1) 22 ng/J (0.051 lb/MMBtu) heat input if the affected facility combusts only coal, or combusts coal with other fuels and has an annual capacity factor for the other fuels of 10 percent (0.10) or less.

(2) 43 ng/J (0.10 lb/MMBtu) heat input if the affected facility combusts coal with other fuels, has an annual capacity factor for the other fuels greater than 10 percent (0.10), and is subject to a federally enforceable requirement limiting operation of the affected facility to an annual capacity factor greater than 10 percent (0.10) for fuels other than coal.

(b) On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that commenced construction, reconstruction, or modification on or before February 28, 2005, that combusts wood or combusts mixtures of wood with other fuels (except coal) and has a heat input capacity of 8.7 MW (30 MMBtu/hr) or greater, shall cause to be discharged into the atmosphere from that affected facility any gases that contain PM in excess of the following emissions limits:

(1) 43 ng/J (0.10 lb/MMBtu) heat input if the affected facility has an annual capacity factor for wood greater than 30 percent (0.30); or

(2) 130 ng/J (0.30 lb/MMBtu) heat input if the affected facility has an annual capacity factor for wood of 30 percent (0.30) or less and is subject to a federally enforceable requirement limiting operation of the affected facility to an annual capacity factor for wood of 30 percent (0.30) or less.

(c) On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that combusts coal, wood, or oil and has a heat input capacity of 8.7 MW (30 MMBtu/hr) or greater shall cause to be discharged into the atmosphere from that affected facility any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.

(d) The PM and opacity standards under this section apply at all times, except during periods of startup, shutdown, or malfunction.

(e)(1) On and after the date on which the initial performance test is completed or is required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that commences construction, reconstruction, or modification after February 28, 2005, and that combusts coal, oil, wood, a mixture of these fuels, or a mixture of these fuels with any other fuels and has a heat input capacity of 8.7 MW (30 MMBtu/hr) or greater shall cause to be discharged into the atmosphere from that affected facility any gases that contain PM in excess of 13 ng/J (0.030 lb/MMBtu) heat input, except as provided in paragraphs (e)(2), (e)(3), and (e)(4) of this section.

(2) As an alternative to meeting the requirements of paragraph (e)(1) of this section, the owner or operator of an affected facility for which modification commenced after February 28, 2005, may elect to meet the requirements of this paragraph. On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that commences modification after February 28, 2005 shall cause to be discharged into the atmosphere from that affected facility any gases that contain PM in excess of both:

(i) 22 ng/J (0.051 lb/MMBtu) heat input derived from the combustion of coal, oil, wood, a mixture of these fuels, or a mixture of these fuels with any other fuels; and

(ii) 0.2 percent of the combustion concentration (99.8 percent reduction) when combusting coal, oil, wood, a mixture of these fuels, or a mixture of these fuels with any other fuels.

(3) On and after the date on which the initial performance test is completed or is required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that commences modification after February 28, 2005, and that combusts over 30 percent wood (by heat input) on an annual basis and has a heat input capacity of 8.7 MW (30 MMBtu/hr) or greater shall cause to be discharged into the atmosphere from that affected facility any gases that contain PM in excess of 43 ng/J (0.10 lb/MMBtu) heat input.

(4) On and after the date on which the initial performance test is completed or is required to be completed under §60.8, whichever date comes first, an owner or operator of an affected facility that commences construction, reconstruction, or modification after February 28, 2005, and that combusts only oil that contains no more than 0.50 weight percent sulfur or a mixture of 0.50 weight percent sulfur oil with other fuels not subject to a PM standard under §60.43c and not using a post-combustion technology (except a wet scrubber) to reduce PM or SO₂ emissions is not subject to the PM limit in this section.

§ 60.44c Compliance and performance test methods and procedures for sulfur dioxide.

(a) Except as provided in paragraphs (g) and (h) of this section and §60.8(b), performance tests required under §60.8 shall be conducted following the procedures specified in paragraphs (b), (c), (d), (e), and (f) of this section, as applicable. Section 60.8(f) does not apply to this section. The 30-day notice required in §60.8(d) applies only to the initial performance test unless otherwise specified by the Administrator.

(b) The initial performance test required under §60.8 shall be conducted over 30 consecutive operating days of the steam generating unit. Compliance with the percent reduction requirements and SO₂ emission limits under §60.42c shall be determined using a 30-day average. The first operating day included in the initial performance test shall be scheduled within 30 days after achieving the maximum production rate at which the affect facility will be operated, but not later than 180 days after the initial startup of the facility. The steam generating unit load during the 30-day period does not have to be the maximum design heat input capacity, but must be representative of future operating conditions.

(c) After the initial performance test required under paragraph (b) of this section and §60.8, compliance with the percent reduction requirements and SO₂ emission limits under §60.42c is based on the average percent reduction and the average SO₂ emission rates for 30 consecutive steam generating unit operating days. A separate performance test is completed at the end of each steam generating unit operating day, and a new

30-day average percent reduction and SO₂emission rate are calculated to show compliance with the standard.

(d) If only coal, only oil, or a mixture of coal and oil is combusted in an affected facility, the procedures in Method 19 of appendix A of this part are used to determine the hourly SO₂emission rate (E_{ho}) and the 30-day average SO₂emission rate (E_{ao}). The hourly averages used to compute the 30-day averages are obtained from the CEMS. Method 19 of appendix A of this part shall be used to calculate E_{ao}when using daily fuel sampling or Method 6B of appendix A of this part.

(e) If coal, oil, or coal and oil are combusted with other fuels:

(1) An adjusted E_{ho}(E_{ho0}) is used in Equation 19–19 of Method 19 of appendix A of this part to compute the adjusted E_{ao}(E_{ao0}). The E_{ho0} is computed using the following formula:

$$E_{ho0} = \frac{E_{ho} - E_w(1 - X_k)}{X_k}$$

Where:

E_{ho0} = Adjusted E_{ho}, ng/J (lb/MMBtu);

E_{ho}= Hourly SO₂emission rate, ng/J (lb/MMBtu);

E_w= SO₂concentration in fuels other than coal and oil combusted in the affected facility, as determined by fuel sampling and analysis procedures in Method 9 of appendix A of this part, ng/J (lb/MMBtu). The value E_wfor each fuel lot is used for each hourly average during the time that the lot is being combusted. The owner or operator does not have to measure E_wif the owner or operator elects to assume E_w= 0.

X_k= Fraction of the total heat input from fuel combustion derived from coal and oil, as determined by applicable procedures in Method 19 of appendix A of this part.

(2) The owner or operator of an affected facility that qualifies under the provisions of §60.42c(c) or (d) (where percent reduction is not required) does not have to measure the parameters E_wor X_kif the owner or operator of the affected facility elects to measure emission rates of the coal or oil using the fuel sampling and analysis procedures under Method 19 of appendix A of this part.

(f) Affected facilities subject to the percent reduction requirements under §60.42c(a) or (b) shall determine compliance with the SO₂emission limits under §60.42c pursuant to paragraphs (d) or (e) of this section, and shall determine compliance with the percent reduction requirements using the following procedures:

(1) If only coal is combusted, the percent of potential SO₂emission rate is computed using the following formula:

$$\%P_s = 100 \left(1 - \frac{\%R_e}{100} \right) \left(1 - \frac{\%R_f}{100} \right)$$

Where:

%P_s= Potential SO₂emission rate, in percent;

%R_g = SO₂ removal efficiency of the control device as determined by Method 19 of appendix A of this part, in percent; and

%R_f = SO₂ removal efficiency of fuel pretreatment as determined by Method 19 of appendix A of this part, in percent.

(2) If coal, oil, or coal and oil are combusted with other fuels, the same procedures required in paragraph (f)(1) of this section are used, except as provided for in the following:

(i) To compute the %P_s, an adjusted %R_g (%R_go) is computed from E_{ao}o from paragraph (e)(1) of this section and an adjusted average SO₂ inlet rate (E_{ai}o) using the following formula:

$$\%R_{g,o} = 100 \left(1 - \frac{E_{ao}}{E_{ai}} \right)$$

Where:

%R_go = Adjusted %R_g, in percent;

E_{ao}o = Adjusted E_{ao}, ng/J (lb/MMBtu); and

E_{ai}o = Adjusted average SO₂ inlet rate, ng/J (lb/MMBtu).

(ii) To compute E_{ai}o, an adjusted hourly SO₂ inlet rate (E_{hi}o) is used. The E_{hi}o is computed using the following formula:

$$E_{hi,o} = \frac{E_{hi} - E_w(1 - X_k)}{X_k}$$

Where:

E_{hi}o = Adjusted E_{hi}, ng/J (lb/MMBtu);

E_{hi} = Hourly SO₂ inlet rate, ng/J (lb/MMBtu);

E_w = SO₂ concentration in fuels other than coal and oil combusted in the affected facility, as determined by fuel sampling and analysis procedures in Method 19 of appendix A of this part, ng/J (lb/MMBtu). The value E_w for each fuel lot is used for each hourly average during the time that the lot is being combusted. The owner or operator does not have to measure E_w if the owner or operator elects to assume E_w = 0; and

X_k = Fraction of the total heat input from fuel combustion derived from coal and oil, as determined by applicable procedures in Method 19 of appendix A of this part.

(g) For oil-fired affected facilities where the owner or operator seeks to demonstrate compliance with the fuel oil sulfur limits under §60.42c based on shipment fuel sampling, the initial performance test shall consist of sampling and analyzing the oil in the initial tank of oil to be fired in the steam generating unit to demonstrate that the oil contains 0.5 weight percent sulfur or less. Thereafter, the owner or operator of the affected facility shall sample the oil in the fuel tank after each new shipment of oil is received, as described under §60.46c(d)(2).

(h) For affected facilities subject to §60.42c(h)(1), (2), or (3) where the owner or operator seeks to demonstrate compliance with the SO₂ standards based on fuel supplier certification, the performance test shall consist of the certification, the certification from the fuel supplier, as described under §60.48c(f), as applicable.

(i) The owner or operator of an affected facility seeking to demonstrate compliance with the SO₂ standards under §60.42c(c)(2) shall demonstrate the maximum design heat input capacity of the steam generating unit by operating the steam generating unit at this capacity for 24 hours. This demonstration shall be made during the initial performance test, and a subsequent demonstration may be requested at any other time. If the demonstrated 24-hour average firing rate for the affected facility is less than the maximum design heat input capacity stated by the manufacturer of the affected facility, the demonstrated 24-hour average firing rate shall be used to determine the annual capacity factor for the affected facility; otherwise, the maximum design heat input capacity provided by the manufacturer shall be used.

(j) The owner or operator of an affected facility shall use all valid SO₂ emissions data in calculating %P_s and E_h under paragraphs (d), (e), or (f) of this section, as applicable, whether or not the minimum emissions data requirements under §60.46c(f) are achieved. All valid emissions data, including valid data collected during periods of startup, shutdown, and malfunction, shall be used in calculating %P_s or E_h pursuant to paragraphs (d), (e), or (f) of this section, as applicable.

§ 60.45c Compliance and performance test methods and procedures for particulate matter.

(a) The owner or operator of an affected facility subject to the PM and/or opacity standards under §60.43c shall conduct an initial performance test as required under §60.8, and shall conduct subsequent performance tests as requested by the Administrator, to determine compliance with the standards using the following procedures and reference methods, except as specified in paragraph (c) of this section.

(1) Method 1 of appendix A of this part shall be used to select the sampling site and the number of traverse sampling points.

(2) Method 3 of appendix A of this part shall be used for gas analysis when applying Method 5, 5B, or 17 of appendix A of this part.

(3) Method 5, 5B, or 17 of appendix A of this part shall be used to measure the concentration of PM as follows:

(i) Method 5 of appendix A of this part may be used only at affected facilities without wet scrubber systems.

(ii) Method 17 of appendix A of this part may be used at affected facilities with or without wet scrubber systems provided the stack gas temperature does not exceed a temperature of 160 °C (320 °F). The procedures of Sections 8.1 and 11.1 of Method 5B of appendix A of this part may be used in Method 17 of appendix A of this part only if Method 17 of appendix A of this part is used in conjunction with a wet scrubber system. Method 17 of appendix A of this part shall not be used in conjunction with a wet scrubber system if the effluent is saturated or laden with water droplets.

(iii) Method 5B of appendix A of this part may be used in conjunction with a wet scrubber system.

(4) The sampling time for each run shall be at least 120 minutes and the minimum sampling volume shall be 1.7 dry standard cubic meters (dscm) [60 dry standard cubic feet (dscf)] except that smaller sampling times or volumes may be approved by the Administrator when necessitated by process variables or other factors.

(5) For Method 5 or 5B of appendix A of this part, the temperature of the sample gas in the probe and filter holder shall be monitored and maintained at 160 ±14 °C (320±25 °F).

(6) For determination of PM emissions, an oxygen (O₂) or carbon dioxide (CO₂) measurement shall be obtained simultaneously with each run of Method 5, 5B, or 17 of appendix A of this part by traversing the duct at the same sampling location.

(7) For each run using Method 5, 5B, or 17 of appendix A of this part, the emission rates expressed in ng/J (lb/MMBtu) heat input shall be determined using:

(i) The O₂ or CO₂ measurements and PM measurements obtained under this section, (ii) The dry basis F factor, and

(iii) The dry basis emission rate calculation procedure contained in Method 19 of appendix A of this part.

(8) Method 9 of appendix A of this part (6-minute average of 24 observations) shall be used for determining the opacity of stack emissions.

(b) The owner or operator of an affected facility seeking to demonstrate compliance with the PM standards under §60.43c(b)(2) shall demonstrate the maximum design heat input capacity of the steam generating unit by operating the steam generating unit at this capacity for 24 hours. This demonstration shall be made during the initial performance test, and a subsequent demonstration may be requested at any other time. If the demonstrated 24-hour average firing rate for the affected facility is less than the maximum design heat input capacity stated by the manufacturer of the affected facility, the demonstrated 24-hour average firing rate shall be used to determine the annual capacity factor for the affected facility; otherwise, the maximum design heat input capacity provided by the manufacturer shall be used.

(c) In place of PM testing with EPA Reference Method 5, 5B, or 17 of appendix A of this part, an owner or operator may elect to install, calibrate, maintain, and operate a CEMS for monitoring PM emissions discharged to the atmosphere and record the output of the system. The owner or operator of an affected facility who elects to continuously monitor PM emissions instead of conducting performance testing using EPA Method 5, 5B, or 17 of appendix A of this part shall install, calibrate, maintain, and operate a CEMS and shall comply with the requirements specified in paragraphs (c)(1) through (c)(13) of this section.

(1) Notify the Administrator 1 month before starting use of the system.

(2) Notify the Administrator 1 month before stopping use of the system.

(3) The monitor shall be installed, evaluated, and operated in accordance with §60.13 of subpart A of this part.

(4) The initial performance evaluation shall be completed no later than 180 days after the date of initial startup of the affected facility, as specified under §60.8 of subpart A of this part or within 180 days of notification to the Administrator of use of CEMS if the owner or operator was previously determining compliance by Method 5, 5B, or 17 of appendix A of this part performance tests, whichever is later.

(5) The owner or operator of an affected facility shall conduct an initial performance test for PM emissions as required under §60.8 of subpart A of this part. Compliance with the PM emission limit shall be determined by using the CEMS specified in paragraph (d) of this section to measure PM and calculating a 24-hour block arithmetic average emission concentration using EPA Reference Method 19 of appendix A of this part, section 4.1.

(6) Compliance with the PM emission limit shall be determined based on the 24-hour daily (block) average of the hourly arithmetic average emission concentrations using CEMS outlet data.

(7) At a minimum, valid CEMS hourly averages shall be obtained as specified in paragraph (d)(7)(i) of this section for 75 percent of the total operating hours per 30-day rolling average.

(i) At least two data points per hour shall be used to calculate each 1-hour arithmetic average.

(ii) [Reserved]

(8) The 1-hour arithmetic averages required under paragraph (d)(7) of this section shall be expressed in ng/J or lb/MMBtu heat input and shall be used to calculate the boiler operating day daily arithmetic average emission concentrations. The 1-hour arithmetic averages shall be calculated using the data points required under §60.13(e)(2) of subpart A of this part.

(9) All valid CEMS data shall be used in calculating average emission concentrations even if the minimum CEMS data requirements of paragraph (d)(7) of this section are not met.

(10) The CEMS shall be operated according to Performance Specification 11 in appendix B of this part.

(11) During the correlation testing runs of the CEMS required by Performance Specification 11 in appendix B of this part, PM and O₂(or CO₂) data shall be collected concurrently (or within a 30- to 60-minute period) by both the continuous emission monitors and the test methods specified in paragraph (d)(7)(i) of this section.

(i) For PM, EPA Reference Method 5, 5B, or 17 of appendix A of this part shall be used.

(ii) For O₂(or CO₂), EPA reference Method 3, 3A, or 3B of appendix A of this part, as applicable shall be used.

(12) Quarterly accuracy determinations and daily calibration drift tests shall be performed in accordance with procedure 2 in appendix F of this part. Relative Response Audit's must be performed annually and Response Correlation Audits must be performed every 3 years.

(13) When PM emissions data are not obtained because of CEMS breakdowns, repairs, calibration checks, and zero and span adjustments, emissions data shall be obtained by using other monitoring systems as approved by the Administrator or EPA Reference Method 19 of appendix A of this part to provide, as necessary, valid emissions data for a minimum of 75 percent of total operating hours on a 30-day rolling average.

(d) The owner or operator of an affected facility seeking to demonstrate compliance under §60.43c(e)(4) shall follow the applicable procedures under §60.48c(f). For residual oil-fired affected facilities, fuel supplier certifications are only allowed for facilities with heat input capacities between 2.9 and 8.7 MW (10 to 30 MMBtu/hr).

§ 60.46c Emission monitoring for sulfur dioxide.

(a) Except as provided in paragraphs (d) and (e) of this section, the owner or operator of an affected facility subject to the SO₂emission limits under §60.42c shall install, calibrate, maintain, and operate a CEMS for measuring SO₂concentrations and either O₂or CO₂concentrations at the outlet of the SO₂control device (or the outlet of the steam generating unit if no SO₂control device is used), and shall record the output of the system. The owner or operator of an affected facility subject to the percent reduction requirements under §60.42c shall measure SO₂concentrations and either O₂or CO₂concentrations at both the inlet and outlet of the SO₂control device.

(b) The 1-hour average SO₂emission rates measured by a CEMS shall be expressed in ng/J or lb/MMBtu heat input and shall be used to calculate the average emission rates under §60.42c. Each 1-hour average SO₂emission rate must be based on at least 30 minutes of operation, and shall be calculated using the data points required under §60.13(h)(2). Hourly SO₂emission rates are not calculated if the affected facility is operated less than 30 minutes in a 1-hour period and are not counted toward determination of a steam generating unit operating day.

(c) The procedures under §60.13 shall be followed for installation, evaluation, and operation of the CEMS.

(1) All CEMS shall be operated in accordance with the applicable procedures under Performance Specifications 1, 2, and 3 of appendix B of this part.

(2) Quarterly accuracy determinations and daily calibration drift tests shall be performed in accordance with Procedure 1 of appendix F of this part.

(3) For affected facilities subject to the percent reduction requirements under §60.42c, the span value of the SO₂CEMS at the inlet to the SO₂control device shall be 125 percent of the maximum estimated hourly potential SO₂emission rate of the fuel combusted, and the span value of the SO₂CEMS at the outlet from the SO₂control device shall be 50 percent of the maximum estimated hourly potential SO₂emission rate of the fuel combusted.

(4) For affected facilities that are not subject to the percent reduction requirements of §60.42c, the span value of the SO₂CEMS at the outlet from the SO₂control device (or outlet of the steam generating unit if no SO₂control device is used) shall be 125 percent of the maximum estimated hourly potential SO₂emission rate of the fuel combusted.

(d) As an alternative to operating a CEMS at the inlet to the SO₂control device (or outlet of the steam generating unit if no SO₂control device is used) as required under paragraph (a) of this section, an owner or operator may elect to determine the average SO₂emission rate by sampling the fuel prior to combustion. As an alternative to operating a CEMS at the outlet from the SO₂control device (or outlet of the steam generating unit if no SO₂control device is used) as required under paragraph (a) of this section, an owner or operator may elect to determine the average SO₂emission rate by using Method 6B of appendix A of this part. Fuel sampling shall be conducted pursuant to either paragraph (d)(1) or (d)(2) of this section. Method 6B of appendix A of this part shall be conducted pursuant to paragraph (d)(3) of this section.

(1) For affected facilities combusting coal or oil, coal or oil samples shall be collected daily in an as-fired condition at the inlet to the steam generating unit and analyzed for sulfur content and heat content according to the Method 19 of appendix A of this part. Method 19 of appendix A of this part provides procedures for converting these measurements into the format to be used in calculating the average SO₂input rate.

(2) As an alternative fuel sampling procedure for affected facilities combusting oil, oil samples may be collected from the fuel tank for each steam generating unit immediately after the fuel tank is filled and before any oil is combusted. The owner or operator of the affected facility shall analyze the oil sample to determine the sulfur content of the oil. If a partially empty fuel tank is refilled, a new sample and analysis of the fuel in the tank would be required upon filling. Results of the fuel analysis taken after each new shipment of oil is received shall be used as the daily value when calculating the 30-day rolling average until the next shipment is received. If the fuel analysis shows that the sulfur content in the fuel tank is greater than 0.5 weight percent sulfur, the owner or operator shall ensure that the sulfur content of subsequent oil shipments is low enough to cause the 30-day rolling average sulfur content to be 0.5 weight percent sulfur or less.

(3) Method 6B of appendix A of this part may be used in lieu of CEMS to measure SO₂at the inlet or outlet of the SO₂control system. An initial stratification test is required to verify the adequacy of the Method 6B of appendix A of this part sampling location. The stratification test shall consist of three paired runs of a suitable SO₂and CO₂measurement train operated at the candidate location and a second similar train operated according to the procedures in §3.2 and the applicable procedures in section 7 of Performance Specification 2 of appendix B of this part. Method 6B of appendix A of this part, Method 6A of appendix A of this part, or a combination of Methods 6 and 3 of appendix A of this part or Methods 6C and 3A of appendix A of this part are suitable measurement techniques. If Method 6B of appendix A of this part is used for the second train, sampling time and timer operation may be adjusted for the stratification test as long as an adequate sample volume is collected; however, both sampling trains are to be operated similarly. For the location to be adequate for Method 6B of appendix A of this part 24-hour tests, the mean of the absolute difference between the three paired runs must be less than 10 percent (0.10).

(e) The monitoring requirements of paragraphs (a) and (d) of this section shall not apply to affected facilities subject to §60.42c(h) (1), (2), or (3) where the owner or operator of the affected facility seeks to demonstrate compliance with the SO₂standards based on fuel supplier certification, as described under §60.48c(f), as applicable.

(f) The owner or operator of an affected facility operating a CEMS pursuant to paragraph (a) of this section, or conducting as-fired fuel sampling pursuant to paragraph (d)(1) of this section, shall obtain emission data for at least 75 percent of the operating hours in at least 22 out of 30 successive steam generating unit

operating days. If this minimum data requirement is not met with a single monitoring system, the owner or operator of the affected facility shall supplement the emission data with data collected with other monitoring systems as approved by the Administrator.

§ 60.47c Emission monitoring for particulate matter.

(a) Except as provided in paragraphs (c), (d), (e), and (f) of this section, the owner or operator of an affected facility combusting coal, oil, or wood that is subject to the opacity standards under §60.43c shall install, calibrate, maintain, and operate a COMS for measuring the opacity of the emissions discharged to the atmosphere and record the output of the system.

(b) All COMS for measuring opacity shall be operated in accordance with the applicable procedures under Performance Specification 1 of appendix B of this part. The span value of the opacity COMS shall be between 60 and 80 percent.

(c) Affected facilities that burn only distillate oil that contains no more than 0.5 weight percent sulfur and/or liquid or gaseous fuels with potential sulfur dioxide emission rates of 26 ng/J (0.06 lb/MMBtu) heat input or less and that do not use a post-combustion technology to reduce SO₂ or PM emissions are not required to operate a CEMS for measuring opacity if they follow the applicable procedures under §60.48c(f).

(d) Owners or operators complying with the PM emission limit by using a PM CEMS monitor instead of monitoring opacity must calibrate, maintain, and operate a CEMS, and record the output of the system, for PM emissions discharged to the atmosphere as specified in §60.45c(d). The CEMS specified in paragraph §60.45c(d) shall be operated and data recorded during all periods of operation of the affected facility except for CEMS breakdowns and repairs. Data is recorded during calibration checks, and zero and span adjustments.

(e) An affected facility that does not use post-combustion technology (except a wet scrubber) for reducing PM, SO₂, or carbon monoxide (CO) emissions, burns only gaseous fuels or fuel oils that contain less than or equal to 0.5 weight percent sulfur, and is operated such that emissions of CO to the atmosphere from the affected facility are maintained at levels less than or equal to 0.15 lb/MMBtu on a boiler operating day average basis is not required to operate a COMS for measuring opacity. Owners and operators of affected facilities electing to comply with this paragraph must demonstrate compliance according to the procedures specified in paragraphs (e)(1) through (4) of this section.

(1) You must monitor CO emissions using a CEMS according to the procedures specified in paragraphs (e)(1)(i) through (iv) of this section.

(i) The CO CEMS must be installed, certified, maintained, and operated according to the provisions in §60.58b(i)(3) of subpart Eb of this part.

(ii) Each 1-hour CO emissions average is calculated using the data points generated by the CO CEMS expressed in parts per million by volume corrected to 3 percent oxygen (dry basis).

(iii) At a minimum, valid 1-hour CO emissions averages must be obtained for at least 90 percent of the operating hours on a 30-day rolling average basis. At least two data points per hour must be used to calculate each 1-hour average.

(iv) Quarterly accuracy determinations and daily calibration drift tests for the CO CEMS must be performed in accordance with procedure 1 in appendix F of this part.

(2) You must calculate the 1-hour average CO emissions levels for each steam generating unit operating day by multiplying the average hourly CO output concentration measured by the CO CEMS times the corresponding average hourly flue gas flow rate and divided by the corresponding average hourly heat input to the affected source. The 24-hour average CO emission level is determined by calculating the arithmetic average of the hourly CO emission levels computed for each steam generating unit operating day.

(3) You must evaluate the preceding 24-hour average CO emission level each steam generating unit operating day excluding periods of affected source startup, shutdown, or malfunction. If the 24-hour average CO emission level is greater than 0.15 lb/MMBtu, you must initiate investigation of the relevant equipment and control systems within 24 hours of the first discovery of the high emission incident and, take the appropriate corrective action as soon as practicable to adjust control settings or repair equipment to reduce the 24-hour average CO emission level to 0.15 lb/MMBtu or less.

(4) You must record the CO measurements and calculations performed according to paragraph (e) of this section and any corrective actions taken. The record of corrective action taken must include the date and time during which the 24-hour average CO emission level was greater than 0.15 lb/MMBtu, and the date, time, and description of the corrective action.

(f) An affected facility that burns only gaseous fuels or fuel oils that contain less than or equal to 0.5 weight percent sulfur and operates according to a written site-specific monitoring plan approved by the appropriate delegated permitting authority is not required to operate a COMS for measuring opacity. This monitoring plan must include procedures and criteria for establishing and monitoring specific parameters for the affected facility indicative of compliance with the opacity standard.

§ 60.48c Reporting and recordkeeping requirements.

(a) The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction and actual startup, as provided by §60.7 of this part. This notification shall include:

(1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

(2) If applicable, a copy of any federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under §60.42c, or §60.43c.

(3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

(4) Notification if an emerging technology will be used for controlling SO₂ emissions. The Administrator will examine the description of the control device and will determine whether the technology qualifies as an emerging technology. In making this determination, the Administrator may require the owner or operator of the affected facility to submit additional information concerning the control device. The affected facility is subject to the provisions of §60.42c(a) or (b)(1), unless and until this determination is made by the Administrator.

(b) The owner or operator of each affected facility subject to the SO₂ emission limits of §60.42c, or the PM or opacity limits of §60.43c, shall submit to the Administrator the performance test data from the initial and any subsequent performance tests and, if applicable, the performance evaluation of the CEMS and/or COMS using the applicable performance specifications in appendix B of this part.

(c) The owner or operator of each coal-fired, oil-fired, or wood-fired affected facility subject to the opacity limits under §60.43c(c) shall submit excess emission reports for any excess emissions from the affected facility that occur during the reporting period.

(d) The owner or operator of each affected facility subject to the SO₂ emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c shall submit reports to the Administrator.

(e) The owner or operator of each affected facility subject to the SO₂ emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c shall keep records and submit reports as required under paragraph (d) of this section, including the following information, as applicable.

(1) Calendar dates covered in the reporting period.

(2) Each 30-day average SO₂ emission rate (ng/J or lb/MMBtu), or 30-day average sulfur content (weight percent), calculated during the reporting period, ending with the last 30-day period; reasons for any noncompliance with the emission standards; and a description of corrective actions taken.

(3) Each 30-day average percent of potential SO₂ emission rate calculated during the reporting period, ending with the last 30-day period; reasons for any noncompliance with the emission standards; and a description of the corrective actions taken.

(4) Identification of any steam generating unit operating days for which SO₂ or diluent (O₂ or CO₂) data have not been obtained by an approved method for at least 75 percent of the operating hours; justification for not obtaining sufficient data; and a description of corrective actions taken.

(5) Identification of any times when emissions data have been excluded from the calculation of average emission rates; justification for excluding data; and a description of corrective actions taken if data have been excluded for periods other than those during which coal or oil were not combusted in the steam generating unit.

(6) Identification of the F factor used in calculations, method of determination, and type of fuel combusted.

(7) Identification of whether averages have been obtained based on CEMS rather than manual sampling methods.

(8) If a CEMS is used, identification of any times when the pollutant concentration exceeded the full span of the CEMS.

(9) If a CEMS is used, description of any modifications to the CEMS that could affect the ability of the CEMS to comply with Performance Specifications 2 or 3 of appendix B of this part.

(10) If a CEMS is used, results of daily CEMS drift tests and quarterly accuracy assessments as required under appendix F, Procedure 1 of this part.

(11) If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under paragraph (f)(1), (2), (3), or (4) of this section, as applicable. In addition to records of fuel supplier certifications, the report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

(f) Fuel supplier certification shall include the following information:

(1) For distillate oil:

(i) The name of the oil supplier;

(ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in §60.41c; and

(iii) The sulfur content of the oil.

(2) For residual oil:

(i) The name of the oil supplier;

(ii) The location of the oil when the sample was drawn for analysis to determine the sulfur content of the oil, specifically including whether the oil was sampled as delivered to the affected facility, or whether the sample was drawn from oil in storage at the oil supplier's or oil refiner's facility, or other location;

(iii) The sulfur content of the oil from which the shipment came (or of the shipment itself); and

(iv) The method used to determine the sulfur content of the oil.

(3) For coal:

(i) The name of the coal supplier;

(ii) The location of the coal when the sample was collected for analysis to determine the properties of the coal, specifically including whether the coal was sampled as delivered to the affected facility or whether the sample was collected from coal in storage at the mine, at a coal preparation plant, at a coal supplier's facility, or at another location. The certification shall include the name of the coal mine (and coal seam), coal storage facility, or coal preparation plant (where the sample was collected);

(iii) The results of the analysis of the coal from which the shipment came (or of the shipment itself) including the sulfur content, moisture content, ash content, and heat content; and

(iv) The methods used to determine the properties of the coal.

(4) For other fuels:

(i) The name of the supplier of the fuel;

(ii) The potential sulfur emissions rate of the fuel in ng/J heat input; and

(iii) The method used to determine the potential sulfur emissions rate of the fuel.

(g)(1) Except as provided under paragraphs (g)(2) and (g)(3) of this section, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.

(2) As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

(3) As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most current requirements in §60.42C to use fuel certification to demonstrate compliance with the SO₂ standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.

(h) The owner or operator of each affected facility subject to a federally enforceable requirement limiting the annual capacity factor for any fuel or mixture of fuels under §60.42c or §60.43c shall calculate the annual capacity factor individually for each fuel combusted. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of the calendar month.

(i) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

(j) The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Rieter Automotive North America, Inc.
Source Location:	101 West Oakley Avenue, Lowell, Indiana 46356
County:	Lake
SIC Code:	3714
Permit Renewal No.:	T089-17994-00013
Permit Reviewer:	ERG/BL

On September 14, 2008, the Office of Air Quality (OAQ) had a notice published in The Post Tribune, in Merrillville Indiana and in The Times, in Munster, Indiana in Lake County, stating that Rieter Automotive North America, Inc., had applied for a Part 70 Operating Permit Renewal. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit 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 permit should be issued as proposed.

On October 10, 2008, comments on the draft permit were submitted by Jim B. Euler on behalf of Rieter Automotive. The summary of the comments is as follows. New language is shown in **bold** and deleted language is shown in ~~strikeout~~. When conditions are added or deleted, remaining conditions and the Table of Contents are renumbered as necessary.

Rieter Automotive Comments

Comment 1:

The foam part line has been removed and the following four (4) emission unit descriptions are incorrect:

- A. The foam department/service parts identified in the permit as "FD" should be identified as "Dept. 48".
- B. The department identified in the permit as "Ultralite/D185" should be identified as "52 North Cell". The North Cell consists of only 1 mold press (identified as Cell 52).
- C. The thermal oxidizer for Line 92 was removed under Significant Permit Modification 089-15455-00013 issued July 30, 2002. Only Line 91 had the ability to produce fully cured product.
- D. The cyclones, baghouses, and collectors associated with the barrier/foam recovery process line are used to recover the foam which is recycled. These control devices are vented indoors.

Response to Comment 1:

The following changes have been made to the permit as a result of this comment:

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

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

- (a) One (1) foam department/service parts (identified as ~~FD~~ **Dept. 48**) constructed prior to 1978 unless otherwise specified, with a maximum capacity of 2,794 pounds of trimmed parts and scrap per hour, consisting of:
 - (1) One (1) hot molding press (identified as HAM 12-press) used for servicing parts with a maximum throughput rate of 64.5 pounds of foam per hour.
 - (2) Two (2) natural gas-fired indirect-fired process heaters (identified as FCU-13 and FCU-14) in the foam department, each with a maximum heat input capacity of 6.0 MMBtu per hour. These units were, installed in 1990.

- (b) One (1) ~~UltraLite/D185~~ **52 North Cell** department, with a maximum capacity of 369 pounds of trimmed parts and scrap per hour and consisting of ~~two (2)~~ **one (1)** mold presses (identified as ~~HETT-1 and HETT-2~~ **Cell 52**), each with a maximum capacity of 622 pounds of pads and 10.2 pounds of DOW film per hour, and exhausting at stack HV-1. ~~These presses were~~ **The press was** installed in 1978.

- ~~(c) One (1) foam part line (identified as FP Line), with a maximum capacity of 1,277 pounds of trimmed parts and scrap per hour, exhausting at two (2) stacks FP-1 and FP-2, and consisting of one (1) electric oven with maximum throughput of 669 pounds of foam sheet and KDA damper per hour. This line was constructed in 1995 and modified to allow for the production of molded polyurethane in 1997.~~

- ...
- ~~(i)(h)~~ **(h)** Line 92 (identified as L92), constructed in 1966 unless specified otherwise, with a maximum capacity of 3,280 pounds of products per hour, using three (3) baghouses ~~and one (1) thermal oxidizer as odor control when producing fully-cured product~~; exhausting at stack FCU-4, and consisting of the following equipment:
 - (1) Two (2) grinders.
 - (2) Four (4) process cyclones. **These cyclones exhaust indoors.**
 - (3) Four (4) process collectors.
 - (4) Two (2) multi-stage aspirators, five (5) fans and a conveying system.
 - (5) One (1) baghouse to control the particulate matter emissions. **The baghouse exhausts indoors.**

- ...
- (k) One (1) barrier/foam recovery process line, processing 2,000 pounds per hour of foam trim scrap. This line was installed in 2000 and consists of the following:
 - (1) Two (2) grinders.
 - (2) Four (4) process cyclones. **These cyclones exhaust indoors.**
 - (3) Four (4) process collectors.
 - (4) Two (2) multi-stage aspirators, five (5) fans and a conveying system.
 - (5) One (1) baghouse to control the particulate matter emissions. **The baghouse exhausts indoors.**

- ...

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) foam department/service parts (identified as ~~FD~~ **Dept. 48**) constructed prior to 1978 unless otherwise specified, with a maximum capacity of 2,794 pounds of trimmed parts and scrap per hour, consisting of:
 - (1) One (1) hot molding press (identified as HAM 12-press) used for servicing parts with a maximum throughput rate of 64.5 pounds of foam per hour.
 - (2) Two (2) natural gas-fired indirect-fired process heaters (identified as FCU-13 and FCU-14) in the foam department, each with a maximum heat input capacity of 6.0 MMBtu per hour. These units were, installed in 1990.
- (b) One (1) ~~Ultralite/D185~~ **52 North Cell** department, with a maximum capacity of 369 pounds of trimmed parts and scrap per hour and consisting of ~~two (2)~~ **one (1)** mold presses (identified as ~~HETT-1 and HETT-2~~ **Cell 52**), ~~each~~ with a maximum capacity of 622 pounds of pads and 10.2 pounds of DOW film per hour, and exhausting at stack HV-1. ~~These presses were~~ **This press was** installed in 1978.
- ~~(c) One (1) foam part line (identified as FP Line), with a maximum capacity of 1,277 pounds of trimmed parts and scrap per hour, exhausting at two (2) stacks FP-1 and FP-2, and consisting of one (1) electric oven with maximum throughput of 669 pounds of foam sheet and KDA damper per hour. This line was constructed in 1995 and modified to allow for the production of molded polyurethane in 1997.~~
- ~~(d)~~(c) One (1) CJ line with a maximum capacity of 2,800 pounds of trimmed parts and scrap per hour, exhausting at stack FCU-15, that can be used to mold either fully cured pad with barriers with maximum throughput of 2,791 pounds per hour or to mold foam pad with damper with maximum throughput of 1,277 pounds per hour. The CJ line is supported by one (1) natural gas-fired CJ oven (identified as FCU-15), with a maximum heat input capacity of 2.5 MMBtu per hour. This line was constructed in 1991.
- ~~(e)~~(d) One (1) foam part cell, also known as Foam Cell Injection Molding, constructed in 1998, with a maximum capacity of 4,273 pounds of trimmed parts and scrap per hour, and consisting of the following equipment:
 - (1) Two (2) chemical storage tanks, each with an 8,000 gallon storage capacity;
 - (2) One (1) metering system;
 - (3) One (1) robotic injector; and
 - (4) One (1) nitrogen blanket system for chemical storage tanks.

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

...

SECTION D.5

FACILITY OPERATION CONDITIONS

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

(h) Line 92 (identified as L92), constructed in 1966 unless specified otherwise, with a maximum capacity of 3,280 pounds of products per hour, using three (3) baghouses ~~and one (1) thermal oxidizer as odor control when producing fully-cured product;~~ exhausting at stack FCU-4, and consisting of the following equipment:

- (1) One (1) natural gas-fired boiler (identified as NAVA) with a maximum heat input capacity of 11.20 MMBtu per hour. This boiler was installed in 1995. Under the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units NSPS (40 CFR 60, Subpart Dc) the boiler is considered a steam generating unit.
- (2) One (1) natural gas-fired oven with a maximum heat input capacity of 0.5 MMBtu per hour.
- (3) One (1) natural gas-fired oven with a maximum heat input capacity of 0.5 MMBtu per hour, used for drying moisture from the padding. This oven was installed in 2004.

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

...

SECTION D.8

FACILITY OPERATION CONDITIONS

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

(k) One (1) barrier/foam recovery process line, processing 2,000 pounds per hour of foam trim scrap. This line was installed in 2000 and consists of the following:

- (1) Two (2) grinders.
- (2) Four (4) process cyclones. **These cyclones exhaust indoors.**
- (3) Four (4) process collectors.
- (4) Two (2) multi-stage aspirators, five (5) fans and a conveying system.
- (5) One (1) baghouse to control the particulate matter emissions. **The baghouse exhausts indoors.**

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

Comment 2:

The equipment included in Section D.1 (foam department/service parts, 52 North Cell department, CJ line, and foam part cell) are not equipped with control devices and actual emissions are minor. Therefore visible emission notations are not necessary to ensure continuous compliance with 326 IAC 6.8. In the Title V Permit No. 089-6629-00013 issued June 16, 1999, IDEM included the following condition:

D.1.4 Monitoring

Monitoring of these facilities is not specifically required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-1, may require this facility to have monitoring requirements.

Response to Comment 2:

Since the allowable emissions from the 52 North Cell Department, the CJ Line, and the Foam Cell Injection Molding are very low, IDEM agrees that neither visible emission notations nor any other compliance monitoring are necessary for these units to demonstrate compliance with 326 IAC 6.8. Based on an emission limit of 0.03 gr/dscf, the foam department/service parts has an allowable emission rate of 18.1 pounds per hour. Since this allowable rate is relatively high, IDEM requires monitoring for this facility. The following changes have been made to the permit as a result of this comment.

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

D.1.1 Particulate [326 IAC 6.8]

- (a) Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), the particulate emissions from the one (1) foam department/service parts, one (1) ~~ultralite/D185, one (1) foam part line~~ **52 North Cell Department**, and one (1) CJ line, shall be limited to 0.03 gr/dscf.
- (b) Pursuant to 326 IAC 6.8-1-2(b)(3), the particulate matter content of natural gas burned in the two (2) process heaters (identified as FCU-13 and FCU-14), each with a maximum heat input capacity of 6.0 MMBtu per hour shall be limited to 0.01 grains per dry standard cubic foot.

...

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.3 Visible Emissions Notations

- (a) Daily visible emission notations of the ~~Ultralite/D185 department (stack HV-1), the foam part line (stacks FP-1 and FP-2), and the CJ Line (stack FCU-15)~~ **foam department/service parts** stack exhausts shall be performed during normal daylight operations. 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) 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.

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

D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain monthly records of total production from the one (1) CJ line.

- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records of daily visible emission notations of the (facility) **foam department/service parts** stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 3:

Line 2 coats a cardboard type material, no vinyl or fabric is used in the process. Please remove all reference to the applicability of 326 IAC 8-2-11.

Comment 4:

The equipment on Line 2 are not equipped with a control device and actual emissions are minor. Therefore visible emission notations are not necessary to ensure continuous compliance with 326 IAC 6.8.

Response to Comments 3 and 4:

IDEM included 326 IAC 8-2-11 (Fabric and Vinyl Coating) because it had been applied throughout Rieter's permitting history, specifically in Registration Permit No. 089-4720-00013 issued February 2, 1996 and Title V permit No. 089-6629-00013 issued June 16, 1999. Rieter has indicated that the Line 2 process has been modified so that it is no longer used to coat vinyl or fabric. The provisions of 326 IAC 8-1-6 are not applicable to the Line 2 because this facility was constructed in 1970, which is prior to January 1, 1980, the applicability date for this rule.

IDEM agrees that neither visible emission notations nor any other compliance monitoring are necessary to demonstrate compliance with 326 IAC 6.8 because of the comparatively low allowable emissions rate. The following changes have been made to the permit as a result of this comment. Condition numbers have been adjusted where appropriate.

~~D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-11]~~

~~Pursuant to 326 IAC 8-2-11 (Fabric and Vinyl Coating Operations), the Permittee operating a facility engaged in the surface coating of fabric or vinyl may not cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds of VOC per gallon of coating excluding water, delivered to the coating applicator when coating fabric and 4.8 pounds of VOC per gallon of coating excluding water, delivered to the coating applicator when coating vinyl.~~

Compliance Determination Requirements

~~D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-4][326 IAC 8-1-2(a)]~~

~~Compliance with the VOC content and usage limitations contained in Conditions D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied and as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

~~D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]~~

~~Compliance with the VOC content limit in condition D.2.2 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:~~

$$A = \frac{\sum (C \times U)}{\sum U}$$

Where:-

A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied; and

U is the usage rate of the coating in gallons per day.

Compliance Monitoring Requirements ~~[326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]~~

~~D.2.5 Visible Emissions Notations~~

-
- ~~(a) Daily visible emission notations of the Line 2 (stack SV 1) exhaust shall be performed during normal daylight operations. 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) 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.~~

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

~~D.2.6 Record Keeping Requirements~~

-
- ~~(a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as specified and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.2.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.~~

~~(1) The VOC content of each coating material and solvent used.~~

~~(2) The amount of each coating material and solvent used.~~

~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~

~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.~~

~~(3) The total VOC usage for each month.~~

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

When non-compliant coatings are used, the following additional records shall be kept:

~~(5) A log of the dates of use.~~

- ~~(6) — The volume weighted VOC content of the coatings, less water, used for each day.~~
- ~~(b) — To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the Line 2 (stack SV-1) exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).~~
- ~~(c) — All records shall be maintained in accordance with Section C — General Record Keeping Requirements, of this permit.~~

Comment 5:

Lines 6 and 7 produce asphalt that is formed into flat sheets and cut to size; no paper is used in the process. Please remove all reference to the applicability of 326 IAC 8-2-5.

Comment 6:

During unloading, conveying, storage, and mixing, the raw materials for Lines 6 and 7 are pneumatically conveyed from supersacks to storage silos or dumping stations. The bag filters separate materials from air when the material has reached its destination. Parametric monitoring is not appropriate for these material handling operations.

The pneumatic conveyance system is not consistently pressurized. Pressure only exists when the silos are being filled. A pressure drop does not indicate abnormal operations, a broken or failed bag, or an increase in opacity or particulate emissions. It should be noted the bag filters are not equipped with manometers and the silos are very tall and unmanned. To perform parametric monitoring would be very difficult. The source will accept visible emissions to ensure normal equipment operation during conveyance.

Response to Comments 5 and 6:

IDEM included 326 IAC 8-2-5 (Paper Coating Operations) because it had been applied throughout Rieter's permitting history, specifically in Registration Permit No. 089-4461-00013 issued May 23, 1995, Registration Permit No. 089-4717-00013 issued December 1, 1995, and Title V permit No. 089-6629-00013 issued June 16, 1999. Rieter has indicated that the Line 6 and 7 processes have been modified and no longer include paper coating. The provisions of 326 IAC 8-1-6 are not applicable to Lines 6 & 7 because these facilities were constructed in the 1960s, which is prior to January 1, 1980, the applicability date for this rule.

The permit has been changed to remove the parametric monitoring for Lines 6 and 7. Abnormal visible emissions should provide an adequate indication to the source of when corrective action should be performed. The following changes have been made to the permit as a result of this comment. Condition numbers have been adjusted where appropriate.

~~D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]~~

~~Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the Permittee operating a facility engaged in the surface coating of paper may not cause, allow or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds of VOC per gallon of coating excluding water, delivered to the three (3) reverse rollcoaters.~~

...

~~D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4][326 IAC 8-1-2(a)]~~

~~Compliance with the VOC content and usage limitations contained in Conditions D.3.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

~~D.3.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]~~

~~Compliance with the VOC content limit in condition D.3.2 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:~~

$$A = \frac{\sum (C \times U)}{\sum U}$$

~~Where:~~

- ~~A is the volume weighted average in pounds VOC per gallon less water as applied;~~
- ~~C is the VOC content of the coating in pounds VOC per gallon less water as applied; and~~
- ~~U is the usage rate of the coating in gallons per day.~~

~~...~~

~~D.3.7 Parametric Monitoring [40 CFR 64.1]~~

~~The Permittee shall record the pressure drop across the baghouse used in conjunction with Lines 6 and 7, at least once per week when the lines are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 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 and 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.~~

~~...~~

~~D.3.9D.3.5 Record Keeping Requirements~~

~~(a) To document compliance with Condition D.3.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as specified and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.3.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.~~

- ~~(1) The VOC content of each coating material and solvent used.~~
- ~~(2) The amount of each coating material and solvent used.
 - ~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~
 - ~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.~~~~

- ~~(3) The total VOC usage for each month.~~
- ~~(4) The weight of VOCs emitted for each compliance period.~~

~~When non-compliant coatings are used, the following additional records shall be kept:~~

- ~~(5) A log of the dates of use.~~

~~(6) — The volume weighted VOC content of the coatings, less water, used for each day.~~

(b) — To document compliance with Condition ~~D.3.6~~**D.3.3**, the Permittee shall maintain records of daily visible emission notations of the Lines 6 and 7 stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

~~(c) — To document compliance with Condition D.3.7, the Permittee shall maintain daily records of the pressure drop. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).~~

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

Comment 7:

No paper is used in the Line 8 process. Please remove all reference to the applicability of 326 IAC 8-2-5.

Comment 8:

During unloading, conveying, storage, and mixing, the raw materials for Line 8 are pneumatically conveyed from supersacks to storage silos or dumping stations. The bag filters separate materials from air when the material has reached its destination. Parametric monitoring is not appropriate for these material handling operations (see Comment 6 above).

Response to Comments 7 and 8:

Rieter has indicated that the Line 8 process has been modified and no longer includes paper coating. Although constructed after the January 1, 1980 applicability date for 326 IAC 8-1-6, the foam part line (identified as FP Line), the foam part cell process, and Line 8 are not subject to the requirements of 326 IAC 8-1-6 because the potential VOC emissions from each of these facilities are less than twenty-five (25) tons per year.

The permit has been changed to remove the parametric monitoring for Line 8. Abnormal visible emissions will adequately indicate to the source that corrective action should be performed. The following changes have been made to the permit as a result of this comment.

~~D.4.2 — Volatile Organic Compound (VOC) [326 IAC 8-2-5]~~

~~Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the Permittee of a facility engaged in the surface coating of paper may not cause, allow or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds of VOC per gallon of coating excluding water, delivered to the one (1) anti block coater.~~

...

~~D.4.4 — Volatile Organic Compounds (VOC) [326 IAC 8-1-4][326 IAC 8-1-2(a)]~~

~~Compliance with the VOC content limitations contained in Conditions D.4.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

~~D.4.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]~~

~~Compliance with the VOC content limit in condition D.4.2 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:~~

$$A = \left[\frac{\sum (C \times U)}{\sum U} \right]$$

~~Where:-~~

- ~~A is the volume weighted average in pounds VOC per gallon less water as applied;~~
- ~~C is the VOC content of the coating in pounds VOC per gallon less water as applied; and~~
- ~~U is the usage rate of the coating in gallons per day.~~

...

~~D.4.7 Parametric Monitoring~~

~~The Permittee shall record the pressure drop across the baghouse used in conjunction with Line 8, at least once per week when the line is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 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 and 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.~~

...

~~D.4.9D.4.5 Record Keeping Requirements~~

~~(a) To document compliance with Condition D.4.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as specified and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.4.2. Records necessary to demonstrate compliance shall be made available within 30 days of the end of each compliance.~~

- ~~(1) The VOC content of each coating material and solvent used.~~
- ~~(2) The amount of each coating material and solvent used.
 - ~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~
 - ~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.~~~~

~~(3) The total VOC usage for each month.~~

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

~~When non-compliant coatings are used, the following additional records shall be kept:~~

~~(5) — A log of the dates of use.~~

~~(6) — The volume weighted VOC content of the coatings, less water, used for each day.~~

~~(b) — To document compliance with Condition D.4.6~~**D.4.3**, the Permittee shall maintain records of daily visible emission notations of the Line 8 stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

~~(c) — To document compliance with Condition D.4.7, the Permittee shall maintain daily records of the pressure drop. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).~~

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

Comment 9:

The thermal oxidizer for Line 92 was removed under Significant Permit Modification 089-15455-00013 issued July 30, 2002. The associated thermal oxidizer monitoring and recordkeeping requirements should be removed. Compliance monitoring for this equipment was removed in the original Title V permit No. T089-6629-00013 issued June 16, 1999.

A visible emission notation of the Line 92 stack exhausts adequately assures continuous compliance with 326 IAC 6.8. Parametric monitoring requirements are redundant. Further, any relationship between baghouse pressure drop and mass emission rates is strictly guesswork. The relationship between mass particle emissions and opacity has long been accepted. The Permittee also asked what they would have to do if visible emission and parametric monitoring observations were in conflict. They state that it is possible that a baghouse could develop a high pressure drop, especially as it builds up an effective "cake". There will be very little if any visible emissions under these conditions. This requirement, in addition to being unnecessary, burdensome, and onerous, sets up a situation where the Permittee will be forced (by ill-considered permit conditions) to shut down this operation to perform maintenance operations that simply are not needed.

Comment 10:

The Permittee stated that Conditions D.5.2 and D.5.3 are redundant. Condition D.5.2 limits annual VOC emissions to 11.6 tons (15,000 tons of total production x 1.50 pounds of VOC per pound of production x 1 ton/2,000 pounds). Condition D.5.3 restricts VOC emissions to 15.6 tons per year. Therefore, compliance with D.5.2 will demonstrate compliance with D.5.3.

Responses to Comments 9 and 10:

IDEM, OAQ has removed the condition requiring the thermal oxidizers to be operated to control VOC. The reporting requirements have been revised as shown below.

Both pressure drop and visible emissions are designed as a trigger that the source performs some corrective actions on the facility. Pressure drop is an indicator of a variety of conditions within the baghouse. Any deviations from the normal operational range of the unit, whether gradual or sudden, should alert the operator that the unit needs maintenance. Monitoring of the pressure drop can alert the operator to relative changes (such as dust cake resistance) over a period of time. The operator can use this information to chart trends and determine if the unit is operating within the optimal range as determined by baseline testing of the unit and manufacturer's specifications. Visible emissions notations are less expensive than direct emissions monitoring using continuous emission monitoring systems (CEMS) and can effectively

indicate operating problems with the control equipment. No changes have been made to the particulate compliance monitoring requirements.

40 CFR Part 70 requires IDEM to include all applicable requirements in each Part 70 Permit issued by the Department. Condition D.5.2 includes the requirements for 326 IAC 8-7-3, while Condition D.5.3 includes the minor limits necessary to avoid the applicable requirements of 326 IAC 2-3. However, IDEM has simplified the VOC reporting requirements associated with the limits contained in Conditions D.5.2 and D.5.3 so that only one form to report VOC emissions is required for these reporting conditions. Compliance with the emission limit in Condition D.5.3 will be based on an emission factor of 1.5 pounds of VOC per ton of production.

The following changes have been made to Conditions D.5.1, D.5.2 and D.5.3. Condition D.5.1 has been revised to clarify the rule requirements, Condition D.5.2 included a typographical error and Condition D.5.3 included an incorrect rule citation.

D.5.1 Particulate [326 IAC 6.8]

- (a) Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), the particulate emissions from Line 92 shall be limited to 0.03 gr/dscf.
- (b) Pursuant to 326 IAC 6.8-1-2(b)(3), the particulate matter ~~content of~~ **emissions from** natural gas burned in the Line 92 boiler (identified as NAVA), with a maximum heat input capacity of 11.2 MMBtu per hour shall be limited to 0.01 grains per dry standard cubic foot (dscf).

D.5.2 Volatile Organic Compound (VOC) [326 IAC 8-7-3]

Pursuant to First Significant Permit Modification no. 089-15455-00013, issued July 30, 2002, the Permittee shall comply with the requirements of 326 IAC 8-7-3 for the one (1) Line 92 as shown below:

- (a) — The VOC emissions from Line 92 shall not exceed 1.50 pounds per ton of production, and the total production shall not exceed 15,500 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

D.5.3 Volatile Organic Compound (VOC) [~~326 IAC 2-2~~ **326 IAC 2-3**]

Pursuant to ~~326 IAC 2-2~~ **326 IAC 2-3**, the VOC emissions from Line 92 shall not exceed 15.6 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with **the** above limit shall limit VOC emissions during the five year contemporaneous period, 1997 through 2002, to less than 25 tons per year and render 326 IAC 2-3 (Emission Offset) not applicable.

~~D.5.7 VOC Control~~

~~In order to comply with D.5.2 and D.5.3, at the thermal oxidizers shall be in operation and control emissions from Line 92 at all times that this unit is in operation.~~

...

D.5.11 Thermal Oxidizer Temperature [40 CFR 64]

- (a) — ~~A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 3-hour average. 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 3-hour average temperature of 1,400°F.~~

- (b) ~~The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.5.2, 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 3-hour average temperature as observed during the compliant stack test.~~

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

~~D.5.12~~**D.5.10** Record Keeping Requirements

- (a) To document compliance with Condition D.5.2 **and D.5.3**, the Permittee shall keep monthly records of total production from Line 92.
- (b) To document compliance with Condition ~~D.5.8~~**D.5.7**, the Permittee shall maintain records of daily visible emission notations of the Line 92 stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (c) To document compliance with Condition ~~D.5.9~~**D.5.8**, the Permittee shall maintain daily records of the pressure drop. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (d) ~~To document compliance with Condition D.5.11, the Permittee shall maintain continuous temperature records for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.~~
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

...

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY

COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Reiter Automotive North America, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356
Part 70 Permit No.: T089-17994-00013
Facility: Line 92
Parameter: Total Production
Limit: **Condition D.5.2: The VOC emissions from Line 92 shall not exceed 1.50 pounds per ton of production.** The total production for Line 92 shall not exceed 15,500 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, respectively.
Condition D.5.3: The VOC emissions from Line 92 shall not exceed 15.6 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Facility	Column 1	Column 2	Column 1 + Column 2
		This Month	Previous 11 Months	12 Months Total
Month 1	Line 92			
Month 2	Line 92			
Month 3	Line 92			

Month	Column 1 (This Month)		Column 2 (Previous 11 Months)		Column 1 + Column 2 (12 Months Total)	
	Tons of Product	Tons of VOC	Tons of Product	Tons of VOC	Tons of Product	Tons of VOC
Month 1						
Month 2						
Month 3						

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

~~INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT~~

~~OFFICE OF AIR QUALITY~~

~~COMPLIANCE DATA SECTION~~

~~Part 70 Quarterly Report~~

Source Name: _____ Reiter Automotive North America, Inc.
 Source Address: _____ 101 West Oakley Avenue, Lowell, Indiana 46356
 Mailing Address: _____ 101 West Oakley Avenue, Lowell, Indiana 46356
 Part 70 Permit No.: _____ T089-17994-00013
 Facility: _____ Line 92
 Parameter: _____ VOC emissions
 Limit: _____ The VOC emissions from Line 92 shall not exceed 15.6 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Facility	Column 1	Column 2	Column 1 + Column 2
		This Month	Previous 11 Months	12 Months Total
Month 1	Line 92			
Month 2	Line 92			
Month 3	Line 92			

~~No deviation occurred in this quarter.~~

~~Deviation/s occurred in this quarter.~~
~~— Deviation has been reported on:~~

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

~~Attach a signed certification to complete this report.~~

Comment 11:

The cyclones, baghouses, and collectors associated with the barrier/foam recovery process line are used to recover the foam which is recycled. These control devices are vented indoors and are not equipped with parametric monitoring equipment. Therefore, the parametric monitoring condition should be removed.

Response to Comment 11:

The following changes have been made to the permit as a result of this comment. Visible emission notations have been removed because these emission units do not have the capability of exhausting outdoors. Condition numbers have been adjusted where appropriate.

~~D.8.3 Visible Emissions Notations~~

- ~~(a) Daily visible emission notations of the Barrier/foam recovery process line stack exhaust shall be performed during normal daylight operations. 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) 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.~~

~~D.8.4~~ Parametric Monitoring

~~The Permittee shall record the pressure drop across the baghouse used in conjunction with Barrier/foam recovery process line, at least once per week when the line is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 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 and 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.~~

...

~~D.8.6~~ D.8.5 Record Keeping Requirements

- ~~(a) To document compliance with Condition D.8.3, the Permittee shall maintain records of daily visible emission notations of the Barrier/foam recovery process line stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).~~
- ~~(b) To document compliance with Condition D.8.4, the Permittee shall maintain daily records of the pressure drop. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).~~
- ~~(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

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

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

Source Background and Description

Source Name:	Reiter Automotive North America, Inc.
Source Location:	101 West Oakley Avenue, Indiana 46356
County:	Lake
SIC Code:	3714
Operation Permit No.:	T089-6629-00013
Operation Permit Issuance Date:	June 16, 1999
Operation Permit Renewal No.:	T089-17994-00013
Permit Reviewer:	ERG/BL

The Office of Air Quality (OAQ) has reviewed a Part 70 Permit Renewal application from Reiter Automotive North America, Inc., relating to the operation of a stationary automotive sound deadening products manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) foam department/service parts (identified as FD) constructed prior to 1978 unless otherwise specified, with a maximum capacity of 2,794 pounds of trimmed parts and scrap per hour, consisting of:
 - (1) One (1) hot molding press (identified as HAM 12-press) used for servicing parts with a maximum throughput rate of 64.5 pounds of foam per hour.
 - (2) Two (2) natural gas-fired indirect-fired process heaters (identified as FCU-13 and FCU-14) in the foam department, each with a maximum heat input capacity of 6.0 MMBtu per hour. These units were, installed in 1990.
- (b) One (1) Ultralite/D185 department, with a maximum capacity of 369 pounds of trimmed parts and scrap per hour and consisting of two (2) mold presses (identified as HETT-1 and HETT-2), each with a maximum capacity of 622 pounds of pads and 10.2 pounds of DOW film per hour, and exhausting at stack HV-1. These presses were installed in 1978.
- (c) One (1) foam part line (identified as FP Line), with a maximum capacity of 1,277 pounds of trimmed parts and scrap per hour, exhausting at two (2) stacks FP-1 and FP-2, and consisting of one (1) electric oven with maximum throughput of 669 pounds of foam sheet and KDA damper per hour. This line was constructed in 1995 and modified to allow for the production of molded polyurethane in 1997.
- (d) One (1) CJ line with a maximum capacity of 2,800 pounds of trimmed parts and scrap per hour, exhausting at stack FCU-15, that can be used to mold either fully cured pad with barriers with maximum throughput of 2,791 pounds per hour or to mold foam pad with damper with maximum throughput of 1,277 pounds per hour. The CJ line is supported by

- one (1) natural gas-fired CJ oven (identified as FCU-15), with a maximum heat input capacity of 2.5 MMBtu per hour. This line was constructed in 1991.
- (e) One (1) foam part cell, also known as Foam Cell Injection Molding, constructed in 1998, with a maximum capacity of 4,273 pounds of trimmed parts and scrap per hour, and consisting of the following equipment:
- (1) Two (2) chemical storage tanks, each with an 8,000 gallon storage capacity;
 - (2) One (1) metering system;
 - (3) One (1) robotic injector; and
 - (4) One (1) nitrogen blanket system for chemical storage tanks.
- (f) Line 2, constructed in 1970 and modified in 1996 unless specified otherwise, with a maximum capacity of 3,744 pounds of saturated felt parts and trim scrap per hour, exhausting at stack SV-1, and consisting of the following equipment:
- (1) One (1) asphalt saturator with a maximum capacity of 15,900 square feet of damper per hour.
 - (2) One (1) coater #1 with a maximum capacity of 15,900 square feet of damper per hour and 63.6 gallons of flexcryl per hour.
 - (3) One (1) coater #2 with a maximum capacity of 15,900 square feet of damper per hour and 31.8 gallons of filler glue per hour.
 - (4) One (1) natural gas-fired oil heater (identified as FCU-10) with a maximum heat input capacity of 4.80 MMBtu per hour. This unit was installed prior to 1983.
- (g) Lines 6 and 7 – bulk handling operations, constructed in the 1960s, and modified in 1983 and 1997, with a maximum capacity of 13,200 pounds of products per hour, using twelve (12) baghouses as controls, exhausting to twelve (12) stacks (BH-1, BH-2, BH-3, BH-4, BH-5, BH-6, BH-7, BH-8, BH-9, BH-10, BH-11 and BH-12), and consisting of the following equipment:
- (1) One (1) natural gas-fired pre-dryer infrared oven with a maximum heat input capacity of 0.307 MMBtu per hour.
 - (2) One (1) reverse roll coater with a maximum capacity of 21,750 square feet of barrier and damper sheet (filled asphaltic sheet) per hour, and used in conjunction with Line 6.
 - (3) One (1) bag dump station controlled by a baghouse BH-12.
 - (4) Nine (9) pneumatically loaded silos (#9 through #17) with a combined maximum capacity of 46,945 pounds per hour.
 - (5) One (1) vacuum receiver with a maximum throughput rate of 108 pounds per hour, and used in conjunction with Line 6.
 - (6) One (1) calcium oxide bag dump station, controlled by a baghouse BH-11.
 - (7) Two (2) reverse roll coaters with a maximum capacity of 13,050 square feet of barrier sheet (filled asphaltic sheet) per hour, and used in conjunction with Line 7.
 - (8) One (1) natural gas-fired oil heater (identified as FCU-11) with a maximum heat input capacity of 4.80 MMBtu per hour. This unit was installed prior to 1983.

- (h) Line 8 – granular material handling operations, constructed in 1989 unless specified otherwise, with a maximum capacity of 14,000 pounds of products per hour, using thirteen (13) baghouses as controls, exhausting at thirteen (13) stacks (BH-13, BH-14, BH-15, BH-16, BH-17, BH-18, BH-19, BH-20, BH-21, BH-22, BH-23, BH-24 and BH-25) and consisting of the following equipment:
- (1) Two (2) bag dump stations:
 - (A) One (1) bag dump station with a maximum capacity of 4,000 pounds per hour.
 - (B) One (1) calcium oxide bag dump station with a maximum capacity of 108 pounds per hour.
 - (2) One (1) vacuum receiver with a maximum throughput rate of 108 pounds per hour.
 - (3) Ten (10) storage silos with combined capacity of 53,914 pounds per hour.
 - (4) One (1) anti-block coater with maximum throughput rate of 36,000 square feet of barrier and damper sheet (filled asphaltic sheet) per hour.
 - (5) One (1) natural gas-fired oil heater (identified as FCU-12), with a maximum heat input capacity of 6.0 MMBtu per hour. This unit was installed in 1991.
- (i) Line 92 (identified as L92), constructed in 1966 unless specified otherwise, with a maximum capacity of 3,280 pounds of products per hour, using three (3) baghouses and one (1) thermal oxidizer as odor control when producing fully cured product; exhausting at stack FCU-4, and consisting of the following equipment:
- (1) One (1) natural gas-fired boiler (identified as NAVA) with a maximum heat input capacity of 11.20 MMBtu per hour. This boiler was installed in 1995. Under the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units NSPS (40 CFR 60, Subpart Dc) the boiler is considered a steam generating unit.
 - (2) One (1) natural gas-fired oven with a maximum heat input capacity of 0.5 MMBtu per hour.
 - (3) One (1) natural gas-fired oven with a maximum heat input capacity of 0.5 MMBtu per hour, used for drying moisture from the padding. This oven was installed in 2004.
- (j) One (1) storage tank area (identified as VOLS), with a maximum capacity of 227,200 gallons of organic liquid, and consisting of the following equipment:
- (1) One (1) fixed roof dome tank (identified as Line 8 (Flux)) with a maximum storage capacity of 30,000 gallons. This unit was installed in 1989.
 - (2) One (1) fixed roof dome tank (identified as Line 8 (Coating)) with a maximum storage capacity of 30,000 gallons. This unit was installed in 1989.
 - (3) One (1) fixed roof dome tank (identified as Line 8 (B-25)) with a maximum storage capacity of 30,000 gallons. This unit was installed in 1989.
 - (4) One (1) fixed roof dome tank (identified as Line 8 Latex #1) storing Latex, with a maximum storage capacity of 3,700 gallons. This unit was installed in 1989.
 - (5) One (1) fixed roof dome tank (identified as Line 8 Latex #2) storing Latex, with a maximum storage capacity of 3,700 gallons. This unit was installed in 1989.

- (6) One (1) fixed roof dome tank (identified as Process Oil) storing process oil, with a maximum storage capacity of 13,500 gallons. This unit was installed prior to 1970.
- (7) One (1) fixed roof dome tank (identified as Antifreeze #1) storing antifreeze, with a maximum storage capacity of 1,128 gallons. This unit was installed in 1990.
- (8) One (1) fixed roof dome tank (identified as Antifreeze #2) storing antifreeze, with a maximum storage capacity of 1,128 gallons. This unit was installed in 1990.
- (9) One (1) fixed roof dome tank (identified as Line 6 & 7 (Flux)) with a maximum storage capacity of 30,455 gallons. This unit was installed in 1976.
- (10) One (1) fixed roof dome tank (identified as Line 6 & 7 (Coating)) with a maximum storage capacity of 30,455 gallons. This unit was installed in 1976.
- (11) One (1) fixed roof dome tank (identified as Line 6 & 7 (B-25)) with a maximum storage capacity of 30,455 gallons. This unit was installed in 1976.
- (12) One (1) fixed roof dome tank (identified as Waste Oil) storing waste oil, with a maximum storage capacity of 2,970 gallons. This unit was installed in 1986.
- (13) One (1) fixed roof dome tank (identified as HT Oil) storing heat transfer oil, with a maximum storage capacity of 1,128 gallons. This unit was installed in 1990.
- (14) One (1) fixed roof dome tank (identified as Lube Oil) storing lube oil, with a maximum storage capacity of 1,128 gallons. This unit was installed in 1990.
- (15) One (1) fixed roof dome tank (identified as Line 6 & 7 (Latex)) storing Latex, with a maximum storage capacity of 3,700 gallons. This unit was installed in 1976.
- (16) One (1) natural gas-fired asphalt tank heater (identified as FCU-6) with a maximum heat input capacity of 3.0 MMBtu per hour.
- (17) One (1) natural gas-fired asphalt tank heater (identified as FCU-7) with a maximum heat input capacity of 3.0 MMBtu per hour.
- (18) One (1) natural gas-fired asphalt tank heater (identified as FCU-8) with a maximum heat input capacity of 3.0 MMBtu per hour.
- (k) One (1) natural gas-fired 350 HP, constructed after 1989, identified as the VAPOR Circulate steam generator, with a maximum heat input capacity of 14.3 MMBtu per hour. Under the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units NSPS (40 CFR 60, Subpart Dc) the boiler is considered a steam generating unit.
- (l) One (1) barrier/foam recovery process line, processing 2,000 pounds per hour of foam trim scrap. This line was installed in 2000 and consists of the following:
 - (1) Two (2) grinders.
 - (2) Four (4) process cyclones.
 - (3) Four (4) process collectors.
 - (4) Two (2) multi-stage aspirators, five (5) fans and a conveying system.
 - (5) One (1) baghouse to control the particulate matter emissions.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities 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) One (1) natural gas-fired boiler (identified as FCU-5) with a maximum heat input capacity of 8.38 MMBtu per hour. This unit was installed prior to 1983 [326 IAC 6.8-1-2].
- (b) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than or equal to 12,000 gallons [326 IAC 8-9].
- (c) Fifty-two (52) natural gas-fired space heaters and four (4) air makeup units with a combined maximum heat input capacity of 54.75 MMBtu per hour, each unit with a heat capacity less than ten (10) MMBtu per hour [326 IAC 6.8-1-2].
- (d) VOC and HAP vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids [326 IAC 8-9].
- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6.8-1-2].
- (f) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (g) Two (2) #1 diesel fuel storage tanks, with a maximum capacity of 275 and 285 gallons, respectively [326 IAC 8-9].
- (h) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (i) Water based adhesives that are less than or equal to 5% by volume of VOC's excluding HAPs.
- (j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (k) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling towers.
- (l) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (m) Two (2) fire pumps. The primary fire pump was constructed in 1996 with a maximum heat input capacity of 200 HP and is #1 diesel fuel fired. The emergency fire pump was constructed in 1995 with a maximum heat input capacity of 110 HP and is fueled by #1 diesel fuel.
- (n) Closed loop heating and cooling systems.

Existing Approvals

The source has been operating under the previous Part 70 Operating Permit T089-6629-00013, issued on June 16, 1999 and the following amendments and modifications:

- (a) Minor Source Modification 089-10909-00013, issued August 16, 1999.
- (b) First Administrative Amendment 089-11497-00013, issued November 24, 1999.

- (c) Second Administrative Amendment 089-12125-00013, issued April 20, 2000.
- (d) First Significant Source Modification 089-11823-00013, issued April 20, 2000.
- (e) First Minor Permit Modification 089-12506-00013, issued September 26, 2000.
- (f) Third Administrative Amendment 089-12693-00013, issued October 17, 2000.
- (g) Fourth Administrative Amendment 089-14776-00013, issued October 9, 2001.
- (h) Second Minor Permit Modification 089-14668-00013, issued October 10, 2001.
- (i) First Minor Source Modification 089-15315-00013, issued May 2, 2002.
- (j) First Significant Permit Modification 089-15455-00013, issued July 30, 2002.
- (k) Second Significant Permit Modification 089-12599-00013, issued November 18, 2002.

All conditions from the previous Part 70 permit have been incorporated into this permit, except for the following which have been either determined to be no longer applicable or have been revised:

- (a) Title V permit No. T089-6629-00013, issued on June 16, 1999:
 - (1) Condition D.1.2: Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities specified in 326 IAC 6-2-1(d)), the particulate matter emissions from the two (2) natural gas-fired process heaters (FCU-13 and FCU-14) with combined heat input capacity of 12.0 MMBtu/hr are limited to 0.45 pounds per million British thermal units per hour (lb/MMBtu).
 - (2) Condition D.2.2: Pursuant to 326 IAC 6-2-2 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(a)) particulate matter emissions from the one (1) 4.8 MMBtu/hr natural gas-fired Line 2 oil heater (FCU-10) shall be limited to 0.54 pounds particulate matter per million British thermal unit (lb/MMBtu).
 - (3) Condition D.3.2: Pursuant to 326 IAC 6-2-2 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(a)), the particulate matter emissions from the one (1) 4.8 MMBtu/hr natural gas-fired Lines 6 & 7 oil heater (FCU-11) shall be limited to 0.54 pounds particulate matter per million British thermal unit (lb/MMBtu).
 - (4) Condition D.4.2: Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities specified in 326 IAC 6-2-1(d)), the particulate matter emissions from the one (1) 6.0 MMBtu/hr natural gas-fired Line 8 oil heater (FCU-12) is limited to 0.42 pounds per million British thermal units per hour (lb/MMBtu).

Reason not incorporated: This source is located in Lake County and has potential to emit 100 tons or more of particulate matter per year. Therefore, it is subject to 326 IAC 6.8-1-2 (Particulate Matter Limitations for Lake County). The limitations established by 326 IAC 6-2 are inconsistent with applicable limitations contained in 326 IAC 6.8 and the limitations contained in 326 IAC 6.8 prevail. Pursuant to 326 IAC 6.8-1-2(b)(3) for all gaseous fuel fired steam generators, the particulate matter content of the natural gas combusted in each of the above units shall not exceed 0.01 grains per dry standard cubic foot (dscf).

- (5) Condition D.5.1(b): Pursuant to 326 IAC 8-7-3 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties), the usage of cleanup solvent for the Line 91 shall be limited such that the VOC emissions from the Line 91 shall not exceed forty-three (43) tons per year when using the thermal oxidizer with an 81% overall control efficiency or overall control efficiency to be

determined in the stack test, whichever is lower. This overall control efficiency and input VOC limitation shall be considered RACT.

Reason not incorporated: As of February 2007, Line 91 has been permanently shut down.

- (6) Condition D.5.2: Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities specified in 326 IAC 6-2-1(c)), the particulate matter emissions from the one (1) 11.2 MMBtu/hr natural gas-fired Line 92 boiler (NAVA) are limited to 0.40 pounds per million British thermal units per hour (lb/MMBtu).

Reason not incorporated: This source is located in Lake County and has potential to emit 100 tons or more of particulate matter per year. Therefore, it is subject to 326 IAC 6.8-1-2 (Particulate Matter Limitations for Lake County). The limitations established by 326 IAC 6-2 are inconsistent with applicable limitations contained in 326 IAC 6.8 and the limitations contained in 326 IAC 6.8 prevail. Pursuant to 326 IAC 6.8-1-2(b)(3) for all gaseous fuel fired steam generators, the particulate matter content of the natural gas combusted in each of the above units shall not exceed 0.01 grains per dry standard cubic foot (dscf).

- (7) Condition D.6.1: Any change or modification to the liquid organic storage tank area or the chemical storage tanks in the foam cell injection molding must be approved by the Office of Air Management (OAM) before such change or modification can occur.

Reason not incorporated: The original condition is redundant. The two (2) chemical storage tanks, which are a part of the foam cell injection molding process, each having a capacity of 8,000 gallons is subject to the requirements of 326 IAC 8-9 (VOL Storage Tanks) because these tanks are located in Lake County and store volatile organic liquid. Since the tank capacities are less than 39,000 gallons, these tanks are subject to only the reporting and recordkeeping requirements under 326 IAC 8-9-6(a) and (b).

- (8) Condition D.7.1: Pursuant to 326 IAC 6-2-2 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(a)), the particulate matter emissions from the one (1) 8.38 MMBtu/hr boiler (FCU-5) shall be limited to 0.54 pounds particulate matter per million British thermal unit (lb/MMBtu).

Reason not incorporated: This source is located in Lake County and has potential to emit 100 tons or more of particulate matter per year. Therefore, it is subject to 326 IAC 6.8-1-2 (Particulate Matter Limitations for Lake County). The limitations established by 326 IAC 6-2 are inconsistent with applicable limitations contained in 326 IAC 6.8 and the limitations contained in 326 IAC 6.8 prevail. Pursuant to 326 IAC 6.8-1-2(b)(3) for all gaseous fuel fired steam generators, the particulate matter content of the natural gas combusted in each of the above units shall not exceed 0.01 grains per dry standard cubic foot (dscf).

- (9) The Permittee is not required to conduct testing to demonstrate compliance with particulate, VOC, and HAP limits as required in the following conditions: Condition D.2.4, Condition D.3.4, Condition D.4.4, Condition D.6.2, and Condition D.7.2. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Reason not incorporated: Testing is not required for any of the PM emitting facilities because the source will be required to monitor and inspect the baghouses to ensure compliance with the applicable limits. Also, no single emission unit accounts for significant potential particulate emissions from the entire source before control.

Pursuant to SPM 089-15455-00013, issued July 30, 2002, testing is required for Line 92 to demonstrate compliance with 326 IAC 8-7-3. Testing is not required for any other VOC/HAP emitting sources because the emissions units do not have any control device and compliance shall be determined using the Material Safety Data Sheets (MSDS).

- (10) Condition D.2.6, Condition D.6.3, and Condition D.7.3: Monitoring of these facilities (asphalt saturator, coater #1, coater #2; liquid organic and chemical storage tanks; and boiler FCU-5) are not specifically required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-7, may require this facility to have monitoring requirements.

Reason not incorporated: There are no applicable compliance monitoring requirements applicable to the emission units listed under Section D.2, D.6, and D.7.

- (b) Second Minor Permit Modification No. 089-14668-00013, issued on October 10, 2001.

- (1) Condition D.9.1: Pursuant to 326 IAC 6-2-2 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(a)), the particulate matter emissions from the one (1) 14.3 MMBtu/hr natural gas-fired boiler shall be limited to 0.55 pounds particulate matter per million British thermal unit (lb/MMBtu).

Reason not incorporated: This source is located in Lake County and has potential to emit 100 tons or more of particulate matter per year. Therefore, it is subject to 326 IAC 6.8-1-2 (Particulate Matter Limitations for Lake County). The limitations established by 326 IAC 6-2 are inconsistent with applicable limitations contained in 326 IAC 6.8 and the limitations contained in 326 IAC 6.8 prevail. Pursuant to 326 IAC 6.8-1-2(b)(3) for all gaseous fuel fired steam generators, the particulate matter content of the natural gas combusted in each of the above units shall not exceed 0.01 grains per dry standard cubic foot (dsCF).

- (2) Condition D.9.2: The Permittee is not required to test this facility (VAPOR Circulate steam generator) by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter (PM) limit specified in Condition D.9.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Reason not incorporated: Testing is not required for this facility because it does not account for significant potential emissions from the entire source before control.

- (3) Condition D.9.3: Monitoring of this facility (VAPOR Circulate steam generator) is not specifically required by this permit.

Reason not incorporated: There are no applicable compliance monitoring requirements applicable to the emission units listed under Section D.9.

- (4) Condition D.9.5: An annual certification for the VAPOR Circulate steam generator shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas-fired Boiler Certification form located at the end of this permit, or its equivalent, no later than April 15 of each year.

Reason not incorporated: An annual certification is not required for steam generating units combusting only natural gas.

- (c) First Significant Permit Modification No. 089-15455-00013, issued on July 30, 2002.

- (1) Condition D.5.10(a): An annual certification for the NAVA Oven Boiler shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas-fired Boiler Certification form located at the end of this permit, or its equivalent, no later than April 15 of each year.

Reason not incorporated: An annual certification is not required for steam generating units combusting only natural gas.

- (3) Condition D.5.8: Monitoring of these facilities (Lines 91 and 92) are not specifically required by this permit.

Reason not incorporated: There are no applicable compliance monitoring requirements applicable to the emission units listed under Section D.5. As of February 2007, Line 91 has been permanently shut down.

- (d) Second Significant Permit Modification No. 089-12599-00013, issued on November 18, 2002.

- (1) Condition D.1.3(a) Pursuant to 326 IAC 8-1-5, RACT for Hot Molding Department shall comply with the following:

- (A) The VOC emissions shall not exceed 5.33 pounds of VOC per ton of production. Total production shall not exceed ten thousand six hundred and twenty six (10, 626) tons per twelve consecutive month period with compliance determined at the end of each month. These limits will limit VOC emissions to less than 28.32 tons per twelve consecutive month period.

- (B) The equipment be operated in an efficient manner.

Reason not incorporated: Hot Molding Department has been permanently shut down.

- (2) Condition D.1.3(c): Pursuant to 326 IAC 8-1-5, RACT for Department 44 shall comply with the following:

- (A) The VOC emissions shall not exceed 0.198 pounds of VOC per ton of production, and the total production shall not exceed 23,232 tons per twelve consecutive month period with compliance determined at the end of each month. This is equivalent to 2.30 tons per twelve consecutive month period; and

- (B) The equipment be operated in an efficient manner.

Reason not incorporated: Department 44 has been permanently shut down.

- (3) Condition D.1.4: The Hot Molding Department, CJ line, and Department 44, facilities shall comply with the following:

- (A) Achieve an overall VOC reduction from baseline actual emissions of at least ninety-eight percent (98%) by the documented reduction in use of VOC containing materials or install an add-on control system that achieves an overall control efficiency of ninety-eight percent (98%), or

- (B) Where it can be demonstrated by the source that control technology does not exist that is reasonably available and both technologically and economically feasible to achieve a ninety-eight percent (98%) reduction in VOC emissions, a source shall achieve an overall VOC reduction of at least eighty-one percent (81%) from baseline actual emissions with the

documented reduction in use of VOC containing materials or install an add-on control system that achieves an overall control efficiency of eighty-one percent (81%).

Reason not incorporated: The one (1) Hot Molding Department and one (1) Department 44 have been permanently shut down. The one (1) CJ line is subject to the requirements of 326 IAC 8-7-3 (RACT). It was determined that the current design for the CJ Line be considered RACT.

- (4) Condition D.1.5: The Permittee is not required to test these facilities (hot molding department, foam part line, CJ Line, Department 44) by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Reason not incorporated: PM/PM10 testing is not required for any of the emission units because the foam part line and CJ Line do not account for significant potential emissions from the entire source before control.

- (e) Second Administrative Amendment no. 089-12125-00013, issued 04/20/2000.

- (1) Condition D.8.2: The Permittee is not required to test this facility (barrier/foam recovery process line) by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Reason not incorporated: Testing is not required for this facility because this facility does not account for significant potential emissions from the entire source before control.

Air Pollution Control Justification as an Integral Part of the Process

The following justification was incorporated into this permit from the previous Part 70 permit No.: T089-6629-00013, issued June 16, 1999:

- (a) The thirteen (13) baghouses on Line 8 are considered an integral part of the raw material handling system for this line. The baghouses have 99% pollution control efficiency. Raw materials are conveyed from the bag dump stations and truck fill stations to silos. Calcium oxide is transported to the vacuum receiver. Material from the silos and vacuum receiver are mixed with liquids and reacted to solid materials. The baghouses collect the unused material and transfer it back to the silos for reuse. The baghouses are part of the system and are used to collect the unused raw material.
- (b) The baghouse on Line 92 is considered an integral part of the resin recycle system. The air stream is filtered for fibers and resins. Captured fibers are recycled into the bale breakers and the resin is recycled to the resin distributor for reuse. This process is a pneumatic conveyance system in which the baghouse acts as a collection device for raw materials used in this process line.

IDEM, OAQ evaluated the justifications and agreed that the thirteen (13) baghouses on Line 8 and the baghouse on Line 92 are an integral part of the raw material handling systems for these process lines. Operating conditions included in the Part 70 renewal permit specify that the baghouses shall operate at all times when the raw material handling on Line 8 and Line 92 are in operation.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Lake County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148 th Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.
O ₃	Nonattainment Subpart 2 Moderate effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.
PM _{2.5}	Nonattainment effective April 5, 2005.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Nonattainment Severe 17 effective November 15, 1990, for the Chicago-Gary-Lake County area for the 1-hour ozone standard which was revoked effective June 15, 2005.	

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.

(1) 1-hour ozone standard

On December 22, 2006 the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air quality Standard for ozone. *South Coast Air Quality Mgmt. Dist. v. EPA*, 472 F.3d 882 (D.C. Cir., December 22, 2006), *rehearing denied* 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007). The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the *South Coast* decision as follows: Gary-Lake-Porter County was previously designated as a severe non-attainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios under the area's previous one-hour standard designation. This means that a source must achieve the Lowest Achievable Emission Rate (LAER) if it exceeds 25 tons per year of VOC emissions and must offset any increase in VOC emissions by a decrease of 1.3 times that amount.

On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NOx threshold for nonattainment new source review. Therefore, VOC

emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.

(2) 8-hour ozone standard

VOC and NO_x emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

(b) PM_{2.5}

U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Lake County as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM_{2.5} promulgated on May 8th, 2008, and effective on July 15th 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants

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

(d) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	greater than 100
PM ₁₀	greater than 100
PM _{2.5}	greater than 100
SO ₂	less than 100
VOC	greater than 100
CO	less than 100
NO _x	less than 100

HAPs	tons/year
Phenol	greater than 10
Formaldehyde	greater than 10
Vinyl Acetate	greater than 10
Total	greater than 25

(a) This existing stationary source is not major for PSD because the emissions of each attainment pollutant are less than two hundred fifty (250) tons per year and this source is not one of the twenty-eight listed source categories.

- (b) This existing stationary source is major for Emission Offset and nonattainment NSR because the VOC emissions are greater than twenty-five (25) tons per year and the PM_{2.5} emissions are greater than one hundred (100) tons per year.

Limited Potential to Emit of the Source

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

The source was issued a Part 70 Operating Permit on June 16, 1999. The table below summarizes the potential to emit, reflecting all limits, of the emission units.

Emission Units	PM	PM10 / PM2.5	SO ₂	NO _x	VOC	CO	HAPs
Foam Department	79.3	79.3	-	-	-	-	-
Ultralite Department	24.8	24.8	-	-	5.35	-	-
Foam Part Line	4.51	4.51	-	-	-	-	-
CJ Line	4.51	4.51	-	-	1.63	-	0.12
Line 2	3.11	3.11	-	-	26.5	-	-
Line 6 and 7	9.01	9.01	-	-	-	-	-
Line 8	9.96	9.96	-	-	3.15	-	-
Line 92	18.8	18.8	-	-	17.4	-	-
Barrier/Foam Recovery Line	8.47	8.47	-	-	-	-	-
Indirection Heating Units (NAVA, VAPOR, FCU-10 through FCU-14, and FCU-5 through FCU-8)	0.58	2.30	0.18	30.3	1.66	25.4	0.57
Direct Heating Units (space heaters, air makeup units, and ovens)	0.48	1.91	0.15	25.1	1.38	21.1	0.47
Diesel Fire Pumps	0.06	0.06	0.06	0.87	0.07	0.19	-
Fugitive Emissions (Unpaved Roads)	0.38	0.07	-	-	-	-	-
TOTAL	164	167	0.39	56.3	57.1	46.7	1.16

"-" negligible

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2006 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	2.0
PM10	3.0
SO ₂	0.0
VOC	3.7
CO	6.1
NO _x	7.3
Pb (HAP)	0.0

Part 70 Permit Conditions

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

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) CAM applies to each pollutant-specific emissions unit as defined in 40 CFR 64.1:
 - (1) with the potential to emit before controls equal to or greater than the major source threshold for a regulated pollutant;
 - (2) that is subject to an emission limitation or standard for regulated pollutant; and
 - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

The following table identifies the applicability of each of these criteria, under 40 CFR 64.1, to each emission unit at this source:

CAM Applicability Analysis							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
Foam Dept. (FD) - PM10	-	326 IAC 6.8-1-2	79.4	79.4	100	N	N
Ultralite / D185 - PM10	-	326 IAC 6.8-1-2	24.9	24.9	100	N	N
Foam Part Line - PM10	-	326 IAC 6.8-1-2	4.51	4.51	100	N	N
CJ Line - PM10	-	326 IAC 6.8-1-2	4.51	4.51	100	N	N
CJ Line - VOC	-	326 IAC 8-7-3(3)	1.20	1.20	100	N	N
Line 2 - PM10	-	326 IAC 6.8-1-2	3.11	3.11	100	N	N
Line 2 - VOC	-	326 IAC 8-2-11	26.5	26.5	100	N	N
Lines 6 and 7 - PM	bag-houses	326 IAC 6.8-1-2	122	12.2	100	Y	N
Line 8 - PM10	bag-houses*	326 IAC 6.8-1-2	12.8	12.8	100	N	N
Line 92 - PM10	bag-houses*	326 IAC 6.8-1-2	18.8	18.8	100	N	N
Line 92 - VOC	thermal oxidizer	326 IAC 8-7-3	174	17.4	100	Y	N
Barrier/Foam Line - PM10	bag-house	326 IAC 6.8-1-2	84.7	8.47	100	N	N

* Pursuant to the previous Part 70 permit No.: T089-6629-00013, issued June 16, 1999 these baghouses are integral.

Based on this evaluation, CAM applies to Lines 6 and 7 for PM and Line 92 for VOC. Lines 6, 7, and 92 are not "large units" as described in 40 CFR 64.5. The Permittee has submitted a CAM plan pursuant to 40 CFR 64 as part of the Part 70 renewal application. The CAM plan for Lines 6, 7, and 92 operations are as follows:

- (1) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 3-hour average. 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 3-hour average temperature of 1,400°F.
 - (2) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test.
 - (3) The Permittee shall record the pressure drop across the baghouse used in conjunction with Lines 6 and 7, at least once per week when the lines are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test.
- (b) The requirements of New Source Performance Standard, 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) are included in this permit for the 11.2 MMBtu per hour natural gas-fired boiler (identified as NAVA) and 14.3 MMBtu per hour VAPOR Circulate steam generator. These units were constructed after the June 9, 1989 applicability date of this rule and each has a heat input capacity greater than 10 MMBtu per hour and less than 100 MMBtu per hour. However, NAVA and the VAPOR Circulate steam generator, are subject to only the recordkeeping and reporting requirements in 40 CFR Part 60.48c because they combust only natural gas.

A copy of the complete text of 40 CFR 60, Subpart Dc is included as an attachment to the permit. The NAVA and the VAPOR Circulate steam generator are subject to the following portions of Subpart Dc:

- (1) 40 CFR Part 60.40c
- (2) 40 CFR Part 60.41c
- (3) 40 CFR Part 60.48c(a), (f), (g)

Pursuant to 40 CFR 60.1, Subpart A, the provisions of 40 CFR 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1 apply to this facility, except as otherwise specified in 40 CFR Part 60, Subpart Dc.

The requirements of New Source Performance Standard, 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) are not included for the 0.5 MMBtu per hour natural gas-fired boilers (identified as NAVA oven and FCU-5). These units have a heat input capacity less than 10 MMBtu per hour.

- (c) The requirements of the New Source Performance Standard, 40 CFR Part 60.110, Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced after June 11, 1973 and prior to May 19, 1978 (326 IAC 12) are not included in the permit for the fixed roof dome tank (identified as Process Oil). The tank is not subject to this NSPS because the Process Oil tank was installed in 1970, which is before the applicability date for this rule.

The requirements of the New Source Performance Standard, 40 CFR Part 60.110, Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced after June 11, 1973 and

prior to May 19, 1978 (326 IAC 12) are not included in the permit for the four (4) fixed roof dome tanks (identified as Line 6 & 7 (Flux), Line 6 & 7 (Coating), Line 6 & 7 (B-25), each with capacity of 30,455 gallons and Line 6 & 7 (Latex), with capacity of 3,700 gallons because although constructed in 1976, the four (4) fixed roof dome tanks each have capacities less than the forty thousand (40,000) gallon applicability threshold for the NSPS.

- (d) The requirements of the New Source Performance Standard, 40 CFR Part 60.110b, Subpart Kb - Standards of Performance for VOL Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (326 IAC 12) are not included in the permit for the following units:
- (1) Two (2) fixed roof dome tanks, identified as Line 8 Latex #1 and Latex #2, both installed in 1989, each with a capacity of 3,700 gallons;
 - (2) Four (4) fixed roof dome tanks, identified as Antifreeze #1, Antifreeze #2, HT Oil and Lube Oil, all installed in 1990, each with a capacity of 1,128 gallons;
 - (3) One (1) fixed roof dome tank, identified as Waste Oil, installed in 1986, with a capacity of 2,970 gallons;
 - (4) Two (2) chemical storage tanks (part of the foam cell injection molding process) each with a capacity of 8,000 gallons; and
 - (5) The VOC and HAP storage tanks listed under Insignificant Activities each with a capacity of less than or equal to 1,000 gallons.

Although constructed after July 23, 1984, the applicability date for this rule, the above units each have storage capacities less than 75 cubic meters (19,813 gallons).

- (e) The requirements of the New Source Performance Standards, 40 CFR Part 60.110b, Subpart Kb – Standards of Performance for VOL Storage Vessels for which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (326 IAC 12) are not included for the following units:
- (1) Three (3) fixed roof dome tanks, identified as Line 8 (Flux), Line 8 (Coating), and Line 8 (B-25), each with capacity of 30,000 gallons.
 - (2) Three (3) fixed roof dome tank, identified as Line 6 & 7 (Flux), Line 6 & 7 (Coating), and Line 6 & 7 (B-25), each with a capacity of 30,455 gallons.

These tanks each have a capacity greater than 75 cubic meters and less than 151 cubic meters, but are used to store liquids with a maximum true vapor pressure less than 15.0 kPa.

- (f) The requirements of the New Source Performance Standard (NSPS), 40 CFR 60, Subpart FFF - Standards of Performance for Flexible Vinyl and Urethane Coating and Printing (326 IAC 12) are not included in this permit. This source does not use a rotogravure printing line used to print flexible vinyl products.
- (g) The requirements of the New Source Performance Standard (NSPS), 40 CFR 60, Subpart QQ - Standards of Performance for the Graphic Arts Industry - Publication Rotogravure Printing (326 IAC 12) are not applicable because this source does not use any rotogravure printing presses for publication. It has molding presses used for producing automotive padding.
- (h) The requirements of the New Source Performance Standard (NSPS) for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII (326 IAC 12) are not included in this permit. Rieter has two (2) internal combustion fire pumps. Both units combust diesel fuel and were installed and constructed prior to the July 11, 2005

effective date of the rule.

- (i) The requirements of the New Source Performance Standard (NSPS) for Stationary Spark Ignition Internal Combustion Engines, 40 CFR 60, Subpart JJJJ (326 IAC 12) are not included in this permit. Rieter does not have any spark ignition internal combustion engines.
- (j) There are no other New Source Performance Standards (NSPS) (40 CFR Part 60 and 326 IAC 12) included in this permit.
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry (326 IAC 20), because this source does not do any printing or publishing.
- (l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (326 IAC 20) are not applicable to this source because it does not use a web coating line engaged in the coating of metal webs used in flexible packaging, or coating of fabric used in pressure sensitive tape and abrasive materials.
- (m) The requirements of National Emission Standards for Hazardous Air Pollutants, 326 IAC 20 and 40 CFR 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines are not included in this permit for the back-up generator and the diesel-driven fire pumps. This source is not a major source of HAP emissions.
- (n) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, 326 IAC 20, 40 CFR 61, and 40 CFR Part 63 included in this permit for this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset)

Lake County's attainment status with respect to ozone has changed considerably over the life of this source. As a result, the following timeline is presented to clarify the source's status with respect to 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset):

- (1) In the 1960's and 1970's, Lines 2, 6, 7, and 92 were constructed together with several storage tanks. By 1977, this source was an existing minor source under PSD because the potential to emit all NSR pollutants was less than 250 tons per year and this source is not in one of the twenty-eight listed source categories. Note that the U.S EPA did not make area designations for the 1-hour ozone, CO, lead, and PM₁₀ standards until November 1990. This source was not located in the portions of Lake County that were designated as nonattainment for the SO₂ and PM₁₀ standards. Therefore, 326 IAC 2-3 did not apply.
- (2) In the 1980's, two (2) natural gas-fired oil heaters (FCU-10 and FCU-11) were added to Lines 2 and Lines 6 and 7; and Department 44, Line 8, and additional storage tanks (Line 8 (Flux), Line 8 (Coating), Line 8 (B-25), Line 8 Latex #1, Line 8 Latex #2) were constructed. These modifications did not trigger PSD review because the increase in emissions of all NSR regulated pollutants did not exceed 250 tons per year. After these modifications, the source remained a minor source under 326 IAC 2-2 (PSD).
- (3) In 1990, two (2) process heaters (FCU-13 and FCU-14) and several storage tanks (Antifreeze #1, Antifreeze #2, HT Oil, and Lube Oil) were added. This modification did not trigger PSD review because the increase in emissions of NSR regulated pollutants did not

exceed 250 tons per year. After this modification, Lake County was designated as severe nonattainment for the 1-hour ozone standard. The source was a major source under 326 IAC 2-3 (EO) because the potential to emit VOC and NOx were greater than 25 tons per year and a minor source under 326 IAC 2-2 (PSD).

Construction Date	Equipment Added	VOC	NOx
1960	Line 6	-	-
1960	Line 7	-	-
1960	Line 92	17.4	-
1970	Line 2	26.5	-
1978	FD Line	-	-
1970	Ultralite/D185	5.35	-
1989	Line 8	3.15	-
1989	storage tanks (VOLS)	-	-
1980-1990	Heaters (FCU-6, FCU-7, FCU-8, FCU-10, FCU-11, FCU-13, FCU-14)	0.72	13.1
	Total	53.2	13.1

- (4) In 1991, the CJ line and a natural gas-fired oil heater (FCU-12) were added. The potential VOC and NOx emission from the project combined with the contemporaneous five year period were less than the de minimus level of 25 tons per year. The increase in all NSR regulated pollutants was less than 250 tons per year. Therefore, 326 IAC 2-3 and 326 IAC 2-2 did not apply to this modification. The source was a major source under 326 IAC 2-3 (EO) and a minor source under 326 IAC 2-2 (PSD).
- (5) During 1995 various construction activities occurred. The potential VOC and NOx emissions from each project, when added to the increases from other projects within a five year contemporaneous period, were less than the de minimus level of 25 tons per year. The increase in all NSR regulated pollutants was less than 250 tons per year. Therefore, 326 IAC 2-3 and 326 IAC 2-2 did not apply. The source was a major source under 326 IAC 2-3 (EO) and a minor source under 326 IAC 2-2 (PSD) after the modification. Construction and emission details are shown below:

Permit No.	Issuance Date	Equipment Added	VOC	NOx
-	1991	CJ Line	1.63	-
-	1991	Ovens (CJ line, FCU-12)	3.65	0.20
089-4282-00013	1/12/1995	Line 92, Fiber Blending	-	-
089-4719-00013	9/26/1995	Boiler (NAVA) and Curing Oven	-	3.30
089-4774-00013	11/6/1995	Replaced Foam Part Line (no net emission change)	-	-
Total			5.28	3.50

- (6) On January 26, 1996, the U.S. EPA granted a NOx waiver to Lake County.
- (7) On February 2, 1996, the source modified Line 2, coaters #1 and #2. The potential VOC emissions from each project, when added to the increases from other projects within a five year contemporaneous period, were less than the de minimus level of 25 tons per year. Therefore, 326 IAC 2-3 did not apply. The source was a major source under 326 IAC 2-3 (EO) and a minor source under 326 IAC 2-2 (PSD).
- (8) On July 30, 1996, the source received construction permit No. 089-5604-00013, for the installation of a 200 horsepower fire pump. The potential to emit of the fire pump is limited based on an enforceable limitation on fuel usage (1,199 gallons of fuel per month). The potential emissions from this pump, when added to the increases from other modifications within a five year contemporaneous period, were less than the de minimus level of 25 tons

per year. The increase in all NSR regulated pollutants was less than 250 tons per year. Therefore, 326 IAC 2-3 and 326 IAC 2-2 did not apply. The source was a major source under 326 IAC 2-3 (EO) and a minor source under 326 IAC 2-2 (PSD) after this modification.

Permit No.	Issuance Date	Equipment Added	VOC	NOx
089-5604-00013	07/30/1996	Fire pump	0.13	4.41
5-yr period total (1995 - 2000)			0.13	7.71

- (9) On December 23, 1996, the source modified Line 92. The potential VOC emissions from this modification, when added to the increases from other projects within the five year contemporaneous period, were less than the de minimus level of 25 tons per year. The increase in NOx was less than 40 tons per year. The increases of all NSR regulated pollutants were less than 250 tons per year. Therefore, 326 IAC 2-3 and 326 IAC 2-2 did not apply. The source was a major source under 326 IAC 2-3 (EO) and a minor source under 326 IAC 2-2 (PSD) after this modification.

- (10) On May 5, 1997, the source received construction registration No. 089-8167-00013, for the modification of Lines 6 and 7. The potential VOC emissions from this project, when added to the increases from other projects within the five year contemporaneous period, were less than the de minimus level of 25 tons per year. The increases of all NSR regulated pollutants were less than 250 tons per year. Therefore, 326 IAC 2-3 and 326 IAC 2-2 did not apply. The source was a major source under 326 IAC 2-3 (EO) and a minor source under 326 IAC 2-2 (PSD) after this modification.

Permit No.	Issuance Date	Equipment Added	VOC	NOx
089-8167-00013	5/5/1997	Modify Line 6&7 New Equipment	0.42	0.13
5-yr period total (1995 - 2000)			0.55	7.84

- (11) On September 8, 1997, the source received construction exemption No. 089-8353-00013, for the modification of the Foam Part Cell. The potential VOC emissions from this project, when added to the increases from other projects within the five year contemporaneous period, were less than the de minimus level of 25 tons per year. The increases of all NSR regulated pollutants were less than 250 tons per year. Therefore, 326 IAC 2-3 and 326 IAC 2-2 did not apply. The source was a major source under 326 IAC 2-3 (EO) and a minor source under 326 IAC 2-2 (PSD) after this modification.

Permit No.	Issuance Date	Equipment Added	VOC	NOx
089-8353-00013	09/08/1997	Modify Foam part line to produce molded polyurethane	0.33	-
5-yr period total (1995 - 2000)			0.88	7.84

- (12) On May 22, 1998, the source received construction exemption No. 089-9217-00013, for the modification of Line 91 by installing a thermal oxidizer rated at 3.70 MMBtu/hr. The potential VOC emissions from this project, when added to the increases from other projects within the five year contemporaneous period, were less than the de minimus level of 25 tons per year. The increases of all NSR regulated pollutants were less than 250 tons per year. Therefore, 326 IAC 2-3 and 326 IAC 2-2 did not apply. The source was a major source under 326 IAC 2-3 (EO) and a minor source under 326 IAC 2-2 (PSD) after this modification. As of February 2007, Line 91 has been permanently shut down.

Permit No.	Issuance Date	Equipment Added	VOC	NOx
089-9217-00013	5/22/1998	Modify Line 91, Thermal Oxidizer	-	4.47
5-yr period total (1995 - 2000)			0.88	12.3

- (13) On November 28, 1998, the source received construction registration No. 089-9967-00013, to construct the Ultralite/D185 Department consisting of two (2) mold presses. The potential VOC emissions from this project, when added to the increases from other projects within the five year contemporaneous period, were less than the de minimus level of 25 tons per year. The increases of all NSR regulated pollutants were less than 250 tons per year. Therefore, 326 IAC 2-3 and 326 IAC 2-2 did not apply. The source was a major source under 326 IAC 2-3 (EO) and a minor source under 326 IAC 2-2 (PSD) after this modification.

Permit No.	Issuance Date	Equipment Added	VOC	NOx
089-9967-00013	11/28/1998	Modify Ultralite line, HETT Presses	5.34	-
5-yr period total (1995 - 2000)			6.22	12.3

- (14) On August 16, 1999, the source received MSM No. 089-10909-00013, to modify Line 91 by replacing an existing 3.7 MMBtu/hr incinerator which controlled emissions from a process oven with a 15.0 MMBtu/hr thermal oxidizer with a low NOx burner. The increase in NOx was less than the 40 ton per year threshold for 326 IAC 2-3. The potential VOC emissions from this project, when added to the increases from other projects within the five year contemporaneous period, were less than the de minimus level of 25 tons per year. The increases of all NSR regulated pollutants were less than 250 tons per year. Therefore, 326 IAC 2-3 and 326 IAC 2-2 did not apply. The source was a major source under 326 IAC 2-3 (EO) and a minor source under 326 IAC 2-2 (PSD) after this modification.

Permit No.	Issuance Date	Equipment Added	VOC	NOx
089-10909-00013 (revision of 089-9217-00013)	8/16/1999	PTE adjustment	- 0.20	4.47 10.0
5-yr period total (1995 - 2000)			6.22 6.42	12.3 17.8

- (15) On April 20, 2000, the source received SSM No. 089-11823-00013, to construct the barrier/foam recovery process line. The installation of the new process line resulted in an increase in potential to emit of 8.47 tons of PM/PM10. There were no increases in VOC and the increase in all NSR regulated pollutants were less than 250 tons per year. Therefore, 326 IAC 2-3 and 326 IAC 2-2 did not apply. The source was a major source under 326 IAC 2-3 (EO) and a minor source under 326 IAC 2-2 (PSD) after this modification.

Permit No.	Issuance Date	Equipment Added	VOC	NOx
089-11823-00013	4/20/2000	Barrier/foam line	-	-
5-yr period total (1995 - 2000)			6.42	17.8

- (16) On September 26, 2000, the source received MPM No. 089-12506-00013, to construct Hot Mold Press HETT Press 3. The modification resulted in an increase in potential to emit of 2.35 tons of PM/PM10 and 2.67 tons of VOC per year. The potential VOC emissions from this project, when added to the increases from other projects within the five year contemporaneous period, were less than the de minimus level of 25 tons per year. The increase in NOx was less than 40 tons per year. The increases in all NSR regulated pollutants were less than 250 tons per year. Therefore, 326 IAC 2-3 did not apply. The source was a major source under 326 IAC 2-3 (EO) and a minor source under 326 IAC 2-2 (PSD) after this modification.

Permit No.	Issuance Date	Equipment Added	VOC	NOx
089-12506-00013	9/26/2000	Modify Ultralite line, HETT Press #3	2.67	-
5-yr period total			9.09	17.8

(1995 - 2000)				
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- (17) On October 10, 2001, the source received MPM No. 089-14668-00013, to construct a 350 HP steam generator, identified as VAPOR. The modification resulted in an increase in potential to emit of 0.5 tons of PM/PM10, 0.3 tons of VOC, 5.3 tons of CO, and 6.3 tons on NOx per year. The potential VOC emissions from this project, when added to the increases from other projects within a five year contemporaneous period, were less than the de minimus level of 25 tons per year. The increase in NOx was less than 40 tons per year. The increases in all NSR regulated pollutants were less than 250 tons per year. Therefore, 326 IAC 2-3 did not apply. The source was a major source under 326 IAC 2-3 (EO) and a minor source under 326 IAC 2-2 (PSD) after this modification. On February 2007, HETT Press #3 was permanently shut down.

Permit No.	Issuance Date	Equipment Added	VOC	NOx
089-14668-00013	10/10/2001	Steam generator	0.30	6.30
5-yr period total (1996 - 2001)			9.39	20.8

- (18) On May 5, 2002, the source received a MSM No. 089-15315-00013, to remove the thermal oxidizers on lines 91 and 92. The modification resulted in an increase in potential to emit of 17.9 tons of VOC per year. The source was a major source under 326 IAC 2-3 (EO) and a minor source under 326 IAC 2-2 (PSD). On February 2007, Line 91 was permanently shut down. This modification increased the potential to emit VOC, including the five year contemporaneous period to greater than 25 tons per year. Line 92 shall be limited as shown below:

In order to maintain VOC emissions during the five year contemporaneous period below 25 tons per year the VOC emissions from Line 92 shall not exceed 15.6 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Permit No.	Issuance Date	Equipment Added	VOC
089-15315-00013	5/2/2002	Remove oxidizers from Lines 91 and 92	15.6
5-yr period total (1997 - 2002)			24.9

- (19) On April 30, 2004, the U.S. EPA issued a final rule establishing the 8-hour ozone designations and classifications for every area in the U.S. Lake County was designated as a moderate nonattainment area for the 8-hour ozone standard.
- (20) On June 15, 2004, Indiana's designations and classifications for the 8-hour ozone standard became effective. At that point, the source became a major source under 326 IAC 2-1.1-5 (Nonattainment New Source Review).
- (21) On November 12, 2004, 326 IAC 1-4-1 was revised to incorporate the 8-hour ozone standards. Since the 1-hour ozone standard was still in effect the potential to emit VOC was greater than 25 tons per year, the source remained a major source under 326 IAC 2-3.
- (22) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the 1-hour ozone standard in Indiana. Since the potential to emit VOC exceeded 100 tons per year, the source remained a major source under 326 IAC 2-3.

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

The following emission units were constructed before July 1, 1997, the applicability date for 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAPs)): Line 6, Line 7, Line 92, Line 2, Foam part line, Ultralite/D185 department, CJ Line, and Line 8. Therefore, these units are not subject to the requirements of 326 IAC 2-4.1.

The source has been modified several times. The following emission units have been constructed or reconstructed since July 1, 1997: Foam Part Line, Line 92, Ultralite/D185 department, and the barrier/foam recovery process line. The single and combination HAP emissions from these facilities are less than ten (10) and twenty-five (25) tons per year, respectively. Therefore, these units are not subject to the requirements of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

Since this source is located in Lake County, and has a potential to emit NO_x and VOC greater than twenty-five (25) tons per year, an emission statement covering the previous calendar year must be submitted by July 1 of each year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6.8-10-3 (Lake County: Fugitive Particulate Matter)

The source provided calculations to demonstrate that source-wide fugitive PM emissions are insignificant. Therefore, no fugitive control plan is required under 326 IAC 6.8-10-1.

State Rule Applicability - Significant Emission Units

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

This source is located in Lake County and has potential to emit 100 tons or more of particulate matter per year. Therefore, it is subject to 326 IAC 6.8-1-2 (Particulate Matter Limitations for Lake County) and not subject to 326 IAC 6-2 because, pursuant to 326 IAC 6-2-1(e), 326 IAC 6-2 does not apply when an 326 IAC 6.8 PM limit is more stringent than the 326 IAC 6-2 allowable limit.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

This source is located in Lake County, but the facilities and operations at this source are not specifically listed in 326 IAC 6.8-2 through 326 IAC 6.8-11. This source is subject to the provisions of 326 IAC 6.8 (Particulate Matter Limitations for Lake County) because the potential to emit particulate from the entire source is greater than 100 tons per year.

- (a) Pursuant to 6.8-1-2(a), the particulate emissions shall be limited as shown below.

Emission Unit ID/Stack	Emission Unit Description	Flow Rate (acfm)	326 IAC 6.8-1-2(a) Limitation (gr/dscf)	Equivalent Particulate Limit (pounds per hour)
Foam Dept (Stack HV-2)	Foam Department/Service Parts	70,467	0.03	18.1
HETT-1 and HETT-2 (Stack - HV-1)	Ultralite/ D185	22,076	0.03	5.68
Each of the two (2) electric ovens (Stack FP-1 and FP-2)	Foam Part Line	4,000	0.03	1.03
CJ Oven (Stack FCU-15)	CJ Line	4,000	0.03	1.03
Line 2 Asphalt Saturator (Stack SV-1)	Line 2	2,760	0.03	0.71
Each of the Bag Fills (Stacks BH-1 through BH-4), Each of the Truck Fills (Stacks BH-5 through BH-9), Vacuum Receiver (Stack BH-10)	Bag Fills Truck Fills Vacuum Receiver	600	0.03	0.15
Each of the Bag Dump Station (Stacks BH-11 and BH-12)	Bag Dump Station	1,000	0.03	0.26
Each of the Bag Fills (Stacks BH-13 through BH-17), Each of the Truck Fills (Stacks BH-18 through BH-22), Vacuum Receiver (Stack BH-24)	Bag Fills Truck Fills Vacuum Receiver	600	0.03	0.15
Each of the Bag Dump Station (Stacks BH-23 and BH-25)	Bag Dump Station	1,000	0.03	0.26
Line 92 (Stack FCU-4)	Line 92	16,704	0.03	4.30
Barrier/Foam Recovery Process Line	Barrier/Foam Recovery Process Line	7,521	0.03	1.93

(b) Pursuant to 326 IAC 6.8-1-2(b)(3), the particulate matter content shall be limited as shown below.

Fuel Used	FCU/Stack ID	Emission Unit Description	326 IAC 6.8-1-2(b) Limitation (gr/dscf)
Natural Gas	FCU-13 and FCU-14	Each of the two (2) heaters	0.01
	FCU-10	Line 2 oil heater	
	FCU-11	Lines 6 and 7 oil heater	
	FCU-12	Line 8 oil heater	
	NAVA	Line 92 boiler	
	FCU-06, FCU-07, and FCU-08	asphalt tank heaters	
	FCU-5	Boiler (Insignificant)	

326 IAC 8-1-6 (New Sources: General Reduction Requirements)

(a) The provisions of 326 IAC 8-1-6 are not applicable to Line 6 & 7 because these facilities was constructed in the 1960s which is prior to January 1, 1980, the applicability date for this rule.

(b) The provisions of 326 IAC 8-1-6 are not applicable to the Line 2 because this facility was constructed in 1970 which is prior to January 1, 1980, the applicability date for this rule.

- (c) The provisions of 326 IAC 8-1-6 are not applicable to the foam department/service parts (identified as FD) because this facility was constructed in 1978 which is prior to January 1, 1980 applicability date for this rule.
- (d) Although constructed after January 1, 1980 applicability date for this rule, the foam part line (identified as FP Line), the foam part cell process, and Line 8 are not subject to the requirements of 326 IAC 8-1-6 because the potential VOC emissions from each of these facilities are less than twenty-five (25) tons per year.
- (e) Although constructed after January 1, 1980 applicability date for this rule, the CJ line is not subject to 326 IAC 8-1-6 because it is subject to the provisions of 326 IAC 8-7-3(3).

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

- (a) The foam part line (identified as FP Line) was installed in 1995, which is after the applicability date for complying with the VOC emission limit as given in 326 IAC 8-7-3. Therefore, it is not subject to the requirements of 326 IAC 8-7-3. Note that the foam part line is also not subject to the requirements of 326 IAC 8-1-6 because the potential VOC emissions from this facility are less than twenty-five (25) tons per year.
- (b) The hot molding department (identified as HMD), the CJ line, and Department 44 were constructed prior to 1995 and rule 326 IAC 8-7 applied to these operations because the potential emissions of VOC from each facility was greater than twenty-five (25) tons per year.

Based on the conclusion of the analysis submitted by the Permittee and included in T089-6629-00013, issued June 16, 1999, it was determined that "it is economically not feasible to achieve 81% control of this source and proposed that the current design of the facility be considered RACT".

However, the Permittee did not submit a RACT request for the operation as required by 326 IAC 8-7-3(3) prior to December 31, 1994. Therefore a significant permit modification was drafted (T089-12599-00013, issued November 18, 2002) to include the requirements of RACT for the above operations. The Part 70 Permit renewal application indicates that the hot molding department and department 44 have been permanently shut down. It was previously determined that the current design for the CJ Line be considered RACT.

Pursuant to 326 IAC 8-7-3(3), the following RACT requirements have been included in the renewal permit:

Pursuant to First Significant Permit Modification no. 089-15455-00013, issued July 30, 2002, Line 92 is subject to the provisions of 326 IAC 8-7-3 and shall comply with the following limit:

The VOC emissions from Line 92 shall not exceed 1.50 pounds per ton of production, and the total production shall not exceed 15,500 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This is equivalent to 11.6 tons of VOC per year. Testing conducted in 2004 confirmed compliance with the 11.6 tons per year limit.

[Note: The Permit Modification no. 089-15455-00013 also limited VOC emissions from Line 91. However, line 91 was permanently shut down on February 2007.]

Pursuant to Significant Permit Modification no. 089-12599-00013, issued November 18, 2002, the Permittee shall comply with the requirements of 326 IAC 8-7-3(3) for one (1) CJ Line as shown below:

The VOC emissions shall not exceed 0.198 pounds of VOC per ton of production, and the total production shall not exceed 12,121 tons per twelve (12) consecutive month period,

with compliance determined at the end of each month. This is equivalent to 1.20 tons of VOC per year; and

The equipment be operated in an efficient manner.

326 IAC 8-2-11 (Fabric and Vinyl Coating)

The requirements of 326 IAC 8-2-11 (Fabric and Vinyl Coating) are applicable to the source because the Permittee uses Line 2 to surface coat fabric and vinyl sheets. Pursuant to this rule:

- (a) The Permittee must limit the VOC content of the coating to 2.9 pounds of VOC per gallon of coating excluding water, delivered to the coating applicator from coater # 1 and # 2 (Line 2) when coating fabric, and
- (b) The Permittee must limit the VOC content of the coating to 4.8 pounds of VOC per gallon of coating excluding water, delivered to the coating applicator from coater # 1 and # 2 (Line 2), when coating vinyl.

Line 2 complies with the requirements of 326 IAC 8-2-11 by using daily averaging to comply with the VOC emission limitations.

326 IAC 8-2-5 (Paper Coating Operations)

The requirements of 326 IAC 8-2-5 (Paper Coating Operations) are applicable to the source because the Permittee coats paper (saturation process) on Lines 6, 7, and 8. Pursuant to this rule, for Lines 6, 7 and 8, the Permittee may not cause, allow, or permit the discharge into the atmosphere of any VOC in excess of 2.9 pounds per gallon, excluding water, delivered to each of the three (3) reverse roll coaters and one (1) anti block coater.

Lines 6, 7, and 8 comply with the requirements of 326 IAC 8-2-5 by using daily averaging to comply with the VOC emission limitations.

326 IAC 8-9 (VOL Storage Vessels)

The following VOL storage tanks are subject to 326 IAC 8-9 (Volatile Organic Storage Vessels) because they are located in Lake County.

- (a) Two (2) chemical storage tanks, each with a capacity of 8,000 gallons;
- (b) Three (3) fixed roof dome tank (identified as Line 8 (Flux), Line 8 (Coating), and Line 8 (B-25)), each with a capacity of 30,000 gallons;
- (c) Three (3) fixed roof dome tanks (identified as Line 8 Latex #1, Line 8 Latex #2, Line 6 & 7 (Latex)) each with capacity of 3,700 gallons;
- (d) One (1) fixed roof dome tank (identified as Process Oil) with capacity of 13,500 gallons;
- (e) Four (4) fixed roof dome tanks (identified as Antifreeze #1, Antifreeze #2, HT Oil, and Lube Oil) each with capacity of 1,128 gallons;
- (f) One (1) fixed roof dome tank (identified as Waste Oil) with a capacity of 2,970 gallons;
- (g) Three (3) fixed roof dome tanks (identified as Line 6 & 7 (Flux), Line 6 & 7 (Coating), and Line 6 & 7 (B-25)) each with capacity of 30,455 gallons; and
- (h) VOC and HAP storage tanks, listed under Insignificant Activities, each with a capacity less than or equal to 1,000 gallons.
- (i) Two (2) #1 diesel fuel storage tanks, listed under Insignificant Activities, with a maximum capacity of 275 and 285 gallons, respectively.

Since the storage capacities for the above tanks are all less than 39,000 gallons, the Permittee is subject only to the recordkeeping and reporting requirement as described in 326 IAC 8-9-6(b). The Permittee shall maintain a record and submit to the department a report containing the following information:

- (1) The vessel identification;

- (2) The vessel dimensions; and
- (3) The vessel capacity.

State Rule Applicability - Insignificant Activities (Other than VOC/HAP Storage Tanks; Boiler FCU-5; and the fire pumps)

326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County)

Pursuant to 326 IAC 6.8-1-2(a) (Nonattainment Area Limitations) the particulate emissions from welding, brazing, and soldering equipment, cutting torches shall each not exceed 0.03 grains per dry standard cubic foot.

326 IAC 6.8-1-2(b)(3) (Particulate Matter Limitations for Lake County)

The fifty-two (52) natural gas-fired combustion units are subject to the requirements of 326 IAC 6.8-1-2(b). The particulate matter content shall be limited to 0.01 lbs/MMBtu.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The two (2) primary and emergency fire pumps, using diesel fuel no. 1, and the 52 space heaters are not subject to the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) because the potential to emit of SO₂ is less than twenty-five (25) tons per year.

326 IAC 7-4-1.1 (Lake County Sulfur Dioxide Emission Limitations)

Although located in Lake County, the two (2) primary and emergency fire pumps, using diesel fuel no. 1, and the 52 space heaters are not subject to the requirements of 326 IAC 7-4-1.1 (Lake County Sulfur Dioxide Emission Limitations) because they are not subject to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations).

Testing Requirements

Pursuant to First Significant Permit Modification no. 089-15455-00013, issued July 30, 2002, VOC testing is required on Line 92 to demonstrate compliance with 326 IAC 8-7-3. Rieter Automotive North America, Inc. conducted a successful stack test on Line 92 on December 3, 2004 as required. These stack tests shall be repeated at least once every five (5) years from the date of the most valid compliance demonstration. The Permittee shall perform testing on Line 92 on or before December 3, 2009. The stack test shall be performed using methods as approved by the commissioner.

Testing is not required for any other VOC/HAP emitting emission units because the emissions units do not have any control device and compliance shall be determined using the Material Safety Data Sheets (MSDS).

Testing is not required for any of the PM/PM10 emitting sources because it does not account for significant potential emissions from the entire source before control.

Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section

D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

Control	Parameter	Frequency	Range	Excursions and Exceedances
Ultralite/D185 department (stack HV-1), the foam part line (stacks FP-1 and FP-2), and the CJ Line (stack FCU-15)	Visible Emissions	Daily	Normal-Abnormal	Response Steps
Line 2 (stack SV-1)	Visible Emissions	Daily	Normal-Abnormal	Response Steps
Lines 6 & 7 twelve (12) baghouses (stacks BH-1, BH-2, BH-3, BH-4, BH-5, BH-6, BH-7, BH-8, BH-9, BH-10, BH-11 and BH-12)	Water Pressure Drop	Daily	3.0 and 6.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	
Line 8 thirteen (13) baghouses (stacks BH-13, BH-14, BH-15, BH-16, BH-17, BH-18, BH-19, BH-20, BH-21, BH-22, BH-23, BH-24 and BH-25)	Water Pressure Drop	Daily	3.0 and 6.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	
Line 92 three (3) baghouses	Water Pressure Drop	Daily	3.0 and 6.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	
Line 92 thermal oxidizer (stack FCU-4)	Oxidizer Temperature	Continuous	At or above 1500F	Response Steps
Barrier/foam recovery process line baghouse	Water Pressure Drop	Daily	3.0 and 6.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	

These monitoring conditions are necessary for the Ultralite/D185 department and Line 2 to ensure compliance with 326 IAC 6.8-1-2 (Particulate Matter Limitations for Lake County) and 326 IAC 2-7 (Part 70 Program).

These monitoring conditions are necessary because the baghouses for Lines 8, 92 and the barrier/foam recovery process lines must operate properly to ensure compliance with 326 IAC 6.8-1-2 (Particulate Matter Limitations for Lake County), and 326 IAC 2-7 (Part 70 Program).

These monitoring conditions are necessary because the baghouses for Lines 6 & 7 must operate properly to ensure compliance with 326 IAC 6.8-1-2 (Particulate Matter Limitations for Lake County), 326 IAC 2-7 (Part 70 Program), and 40 CFR 64 (Compliance Assurance Monitoring).

These monitoring conditions are necessary because the thermal oxidizer for Line 92 must operate properly to ensure compliance with 326 IAC 8-7-1 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties), 326 IAC 2-7 (Part 70 Program), and 40 CFR 64.

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved.

Conclusion

The operation of this automotive sound deadening products manufacturing plant shall be subject to the conditions of the attached proposed Part 70 Operating Permit Renewal No. T089-17944-00013.

**Appendix A: Emission Calculations
Emission Summary**

Company Name: Rieter Automotive North America, Inc.
Address: 101 West Oakley Avenue, Indiana 46356
Title V Renewal: T089-17994-00013
Reviewer: ERG/BL
Date: August 8, 2007

Process/emission unit	Potential to Emit After Issuance (tons/year)						
	PM	PM10	SO ₂	VOC	CO	NOx	HAPs
Foam Dept / Service Parts	79.4	79.4	-	-	-	-	-
Ultralite Department	24.9	24.9	-	5.35	-	-	-
Foam Part Line	4.51	4.51	-	-	-	-	-
CJ Line	4.51	4.51	-	1.63	-	-	0.12
Line 2	3.11	3.11	-	26.5	-	-	-
Line 6 and 7	9.01	9.01	-	-	-	-	-
Line 8	9.69	9.69	-	3.15	-	-	-
Line 92	18.8	18.8	-	17.4	-	-	-
Barrier/Foam Recovery Line	8.47	8.47	-	-	-	-	-
Indirection Heating Units (NAVA, VAPOR, FCU-10 through FCU-14, and FCU-5 through FCU-8)	0.58	2.30	0.18	1.66	25.4	30.3	0.57
Direct Heating Units (space heaters, air makeup units, and ovens)	0.48	1.91	0.15	1.38	21.1	25.1	0.47
Fire Pumps	0.06	0.06	0.06	0.07	0.19	0.87	-
TOTAL	163	167	0.39	57.1	46.7	56.3	1.16

**Appendix A: Emission Calculations
Emission Units Under Section D.1**

Company Name: Rieter Automotive North America, Inc.
Address: 101 West Oakley Avenue, Indiana 46356
Title V Renewal: T089-17994-00013
Reviewer: ERG/BL
Date: August 8, 2007

Unit Operations	Stack ID	Air Flow Rate (acfm)	326 IAC 6.8-1-2(a) Limitation (gr/dscf)	Limited PTE of PM / PM10		326 IAC 8-1-5 Limitation (RACT)		
				(lbs/hr)	(tons/yr)	VOC E.F. (lbs/ton)	Max Production (tons/yr)	Limited PTE of VOC (tons/yr)
Foam Dept / Service Parts	HV-2	70,467	0.03	18.1	79.4	-	-	-
Ultralite / D185	HV-1	22,076	0.03	5.68	24.9	-	-	-
Foam Part Line	FP-1 and FP2	4,000	0.03	1.03	4.51	-	-	-
CJ Line	FCU-15	4,000	0.03	1.03	4.51	0.198	12,121	1.20
Foam Part Cell	NA	NA	NA	NA	NA	NA	NA	NA

Unit Operations	Unlimited PTE of VOC (lb/hr) *	Unlimited PTE of VOC (ton/yr)	Unlimited PTE of HAP (lb/hr) *	Unlimited PTE of HAP (ton/yr)
CJ Oven				
Fully Cured Pad with Barrier	0.23	1.03	0.04	0.12
Foam Pad with Damper	0.12	0.61	-	-
Total		1.63		0.12

* Emission test data presented in exemption no. 089-4301-00013.

Methodology

Limited PTE of PM/PM10 (lbs/hr) = Air Flow Rate (acfm) * PM limit (gr/dscf) * 60 min/hr * 1 lb/7,000 gr
 Limited PTE of PM/PM10 (tons/yr) = Air Flow Rate (acfm) * PM limit (gr/dscf) * 60 min/hr * 1 lb/7,000 gr * 8,760 hrs/yr * 1 ton/2,000 lbs
 Limited PTE of VOC (tons/yr) = VOC E.F. (lbs/ton of production) * Max Production (tons/yr) * 1 ton/2,000 lbs
 Unlimited PTE of VOC / HAP (ton/yr) = Unlimited PTE (lbs/hr) * 8,760 hrs/yr * 1 ton/2,000 lbs

Unit Operations	VOC Press E.F. (lbs/lb) **	VOC Tool E.F. (lbs/lb) **	PM/PM10 Press E.F. (lbs/lb) **	PM/PM10 Tool E.F. (lbs/lb) **	Max Production (lbs/hr)	Unlimited PTE of VOC (ton/yr)	Unlimited PTE of PM/PM10 (ton/yr)
Ultralite / D185							
HETT1	3.41E-04	6.25E-04	5.12E-04	3.41E-04	632	2.67	2.36
HETT2	3.41E-04	6.25E-04	5.12E-04	3.41E-04	632	2.67	2.36
Total						5.35	4.72

** Emission test data presented in Minor Permit Modification no. 089-12506-00013. As of February 2007, HETT Press #3 has been permanently shut down.

Methodology

Unlimited PTE of VOC (ton/yr) = (VOC Press E.F. (lbs/lb) + VOC Tool E.F. (lbs/lb)) * Max Production (lbs/hr) * 8,760 hrs/yr * 1 ton/2,000 lbs
 Unlimited PTE of PM/PM10 (ton/yr) = (PM/PM10 Press E.F. (lbs/lb) + PM/PM10 Tool E.F. (lbs/lb)) * Max Production (lbs/hr) * 8,760 hrs/yr * 1 ton/2,000 lbs

**Appendix A: Emission Calculations
Emission Units Under Section D.2
(Line 2)**

Company Name: Rieter Automotive North America, Inc.
Address: 101 West Oakley Avenue, Indiana 46356
Title V Renewal: T089-17994-00013
Reviewer: ERG/BL
Date: August 8, 2007

Unit Operations	Stack ID	Air Flow Rate (acfm)	326 IAC 6.8-1-2(a) Limitation (gr/dscf)	PTE of PM / PM10		326 IAC 8-2-11 VOC Limitation			
				(lbs/hr)	(tons/yr)	Limited Material VOC (lbs/gal) *	Max Prod (gal/hr)	Limited PTE of VOC (lbs/hr)	Limited PTE of VOC (tons/yr)
Line 2 - Asphalt Saturator	SV-1	2,760	0.03	0.71	3.11	0	0	0	0
Line 2 - Coater #1	NA	0	0	0	0	4.80	63.6	305	1,337
Line 2 - Coater #2	NA	0	0	0	0	4.80	31.8	153	669

	Density (lbs/gal)	Weight % Volatile (H2O& Organics)	Weight % Organics	Gal of Mat (gal/unit)	Maximum (unit/hr)	Unlimited PTE of VOC (lb/hr)	Unlimited PTE of VOC (tons/yr)
Line 2 - Coater #1 - Flexacryl 2586	8.5	37.5%	0.70%	0.00468	15,900	4.43	19.4
Line 2 - Coater #2 - Fuller PD-0681 Fluor	8.4	44.0%	0.60%	0.00202	15,900	1.62	7.09
Total							26.5

Transfer efficiency for the coaters are 100%. For additional details see Title V permit 089-6629-00013.

* Pursuant to 326 IAC 8-2-11, when coating fabric the VOC content of the coating shall be limited to 2.9 pounds of VOC per gallon of coating excluding water; when coating vinyl the VOC content of the coating shall be limited to 4.8 pounds of VOC per gallon of coating excluding water.

Methodology

PTE of PM/PM10 (lbs/hr) = Air Flow Rate (acfm) * PM limit (gr/dscf) * 60 min/hr * 1 lb/7,000 gr

PTE of PM/PM10 (tons/yr) = Air Flow Rate (acfm) * PM limit (gr/dscf) * 60 min/hr * 1 lb/7,000 gr * 8,760 hrs/yr * 1 ton/2,000 lbs

Limited PTE of VOC (lbs/hr) = Limited Material VOC (lbs/gal) * Max Production (gal/hr)

Limited PTE of VOC (tons/yr) = Limited Material VOC (lbs/gal) * Max Production (gal/hr) * 8,760 hrs/yr * 1 ton/2,000 lbs

Unlimited PTE of VOC (lbs/hr) = Density (lb/gal) * Weight % Organics * Gal of Material (gal/unit) * Maximum (units/hr)

Unlimited PTE of VOC (tons/yr) = Density (lb/gal) * Weight % Organics * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

**Appendix A: Emission Calculations
Emission Units Under Section D.3
(Lines 6 & 7)**

Company Name: Rieter Automotive North America, Inc.
Address: 101 West Oakley Avenue, Indiana 46356
Title V Renewal: T089-17994-00013
Reviewer: ERG/BL
Date: August 8, 2007

Unit Operations	Stack ID	Air Flow Rate (acfm)	326 IAC 6.8-1-2(a) Limitation	PTE of PM / PM10		326 IAC 8-2-5 VOC Limitation (lbs/gal)
				(lbs/hr)	(tons/yr)	
Lines 6 and 7						
Each of the Bag Fills	BH-1 through BH-4	600	0.03	0.15	0.68	0
Each of the Truck Fills	BH-5 through BH-9	600	0.03	0.15	0.68	0
Vacuum Receiver	BH-10	600	0.03	0.15	0.68	0
Each of the Bag Dump Station	BH-11 and BH-12	1,000	0.03	0.26	1.13	0
Line 6 - 1 Reverse Roll Coater	NA	-	-	-	-	2.90
Line 7 - 2 Reverse Roll Coaters	NA	-	-	-	-	2.90 each
All twelve (12) baghouses	BH-1 through BH-12	8,000	0.03	2.06	9.01	

Methodology

PTE of PM/PM10 (lbs/hr) = Air Flow Rate (acfm) * PM limit (gr/dscf) * 60 min/hr * 1 lb/7,000 gr
PTE of PM/PM10 (tons/yr) = Air Flow Rate (acfm) * PM limit (gr/dscf) * 60 min/hr * 1 lb/7,000 gr * 8,760 hrs/yr * 1 ton/2,000 lbs

**Appendix A: Emission Calculations
Emission Units Under Section D.4
(Line 8)**

Company Name: Rieter Automotive North America, Inc.
Address: 101 West Oakley Avenue, Indiana 46356
Title V Renewal: T089-17994-00013
Reviewer: ERG/BL
Date: August 8, 2007

Unit Operations	Stack ID	Air Flow Rate (acfm)	326 IAC 6.8-1-2(a) Limitation	PTE of PM / PM10 (lbs/hr) (tons/yr)		326 IAC 8-2-5 VOC Limitation (lbs/gal)
Line 8						
Each of the Bag Fills	BH-13 through BH-17	600	0.03	0.15	0.68	0
Each of the Truck Fills	BH-18 through BH-22	600	0.03	0.15	0.68	0
Vacuum Receiver	BH-24	600	0.03	0.15	0.68	0
Each of the Bag Dump Station	BH-23 and BH-25	1,000	0.03	0.26	1.13	0
Line 8 - Anti Block Coater	NA	-	-	-	-	2.90
All thirteen (13) baghouses	BH-13 through BH-25	8,600	0.03	2.21	9.69	

	Density (lbs/gal)	Weight % Volatile (H2O& Organics)	Weight % Organics	Gal of Mat (gal/unit)	Maximum (unit/hr)	Unlimited PTE of VOC (lb/hr)	Unlimited PTE of VOC (tons/yr)
Line 8, Coater 1, Antiblock	10.9	42.8%	0.1%	0.00183	36,000	0.72	3.15
Line 8, Coater 2, Hot Melt	8	0.0%	0.0%	0.00250	36,000	0.00	0.00
Total							3.15

Transfer efficiency for the coaters are 100%. For additional details see Title V permit 089-6629-00013.

Methodology

PTE of PM/PM10 (lbs/hr) = Air Flow Rate (acfm) * PM limit (gr/dscf) * 60 min/hr * 1 lb/7,000 gr
PTE of PM/PM10 (tons/yr) = Air Flow Rate (acfm) * PM limit (gr/dscf) * 60 min/hr * 1 lb/7,000 gr * 8,760 hrs/yr * 1 ton/2,000 lbs
Unlimited PTE of VOC (lbs/hr) = Density (lb/gal) * Weight % Organics * Gal of Material (gal/unit) * Maximum (units/hr)
Unlimited PTE of VOC (tons/yr) = Density (lb/gal) * Weight % Organics * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

**Appendix A: Emission Calculations
Emission Units Under Section D.5
(Line 92)**

Company Name: Rieter Automotive North America, Inc.
Address: 101 West Oakley Avenue, Indiana 46356
Title V Renewal: T089-17994-00013
Reviewer: ERG/BL
Date: August 8, 2007

Unit Operations	Stack ID	Air Flow Rate (acfm)	326 IAC 6.8-1-2(a) Limitation (gr/dscf)	PTE of PM / PM10		326 IAC 8-7-3 Limitation		
				(lbs/hr)	(tons/yr)	VOC E.F. (lbs/ton) *	Max Production (tons/yr) **	Limited PTE of VOC (tons/yr)
Line 92	FCU-4	16,704	0.03	4.30	18.8	1.5	23,224	17.4

* Stack test conducted 3/13/01 and verified 12/2/04.

** Limit according to first Minor Source Modification No. 089-15315-00013. This production limit was originally split between Lines 91 and 92. As of February 2007, Line 91 has been permanently shut down.

Methodology

PTE of PM/PM10 (lbs/hr) = Air Flow Rate (acfm) * PM limit (gr/dscf) * 60 min/hr * 1 lb/7,000 gr

PTE of PM/PM10 (tons/yr) = Air Flow Rate (acfm) * PM limit (gr/dscf) * 60 min/hr * 1 lb/7,000 gr * 8,760 hrs/yr * 1 ton/2,000 lbs

Limited PTE of VOC (tons/yr) = VOC E.F. (lbs/ton) * Max Production (tons/yr) * 1 ton/2,000 lbs

Appendix A: Emission Calculations
Emission Units Under Section D.9

Company Name: Rieter Automotive North America, Inc.
Address: 101 West Oakley Avenue, Indiana 46356
Title V Renewal: T089-17994-00013
Reviewer: ERG/BL
Date: August 8, 2007

Unit Operations	Stack ID	Air Flow Rate (acfm)	326 IAC 6.8-1-2(a) Limitation	PTE of PM / PM10	
				(lbs/hr)	(tons/yr)
Barrier/Foam Recovery Process Line	NA	7,521	0.03	1.93	8.47

Methodology

PTE of PM/PM10 (lbs/hr) = Air Flow Rate (acfm) * PM limit (gr/dscf) * 60 min/hr * 1 lb/7,000 gr

PTE of PM/PM10 (tons/yr) = Air Flow Rate (acfm) * PM limit (gr/dscf) * 60 min/hr * 1 lb/7,000 gr * 8,760 hrs/yr * 1 ton/2,000 lbs

Natural Gas Combustion Only

MM BTU/HR <100

Indirect Heating Units (NAVA, VAPOR, FCU-10 through FCU-14, and FCU-5 through FCU-8)

Company Name: Rieter Automotive North America, Inc.
Address: 101 West Oakley Avenue, Indiana 46356
Title V Renewal: T089-17994-00013
Reviewer: ERG/BL
Date: August 8, 2007

Heat Input Capacity
MMBtu/hr
70.5

Potential Throughput
MMSCF/yr
605

Pollutant

	PM*	PM10*	SO2	NOx**	VOC	CO
Emission Factor (lb/MMSCF)	1.90	7.60	0.60	100	5.50	84.0
Potential to Emit (tons/yr)	0.58	2.30	0.18	30.3	1.66	25.4

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM combined.

**Emission factor for NOx (Uncontrolled) = 100 lb/MMSCF

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July 1998).

All emission factors are based on normal firing.

Methodology

Potential Throughput (MMSCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMSCF/1,020 MMBtu
 Potential to Emit (tons/yr) = Potential Throughput (MMSCF/yr) x Emission Factor (lb/MMSCF) x 1 ton/2,000 lbs

Appendix A: Emission Calculations
HAPs Emissions from Natural Gas Combustion
MM BTU/HR <100

Indirect Heating Units (NAVA, VAPOR, FCU-10 through FCU-14, and FCU-5 through FCU-8)

Company Name: Rieter Automotive North America, Inc.
Address: 101 West Oakley Avenue, Indiana 46356
Title V Renewal: T089-17994-00013
Reviewer: ERG/BL
Date: August 8, 2007

HAPs - Organics

Emission Factor (lb/MMSCF)	Benzene 2.10E-03	Dichlorobenzene 1.20E-03	Formaldehyde 7.50E-02	Hexane 1.80E+00	Toluene 3.40E-03	Total HAPs
Potential to Emit (tons/yr)	6.36E-04	3.63E-04	2.27E-02	5.45E-01	1.03E-03	0.57

HAPs - Metals

Emission Factor (lb/MMSCF)	Lead 5.00E-04	Cadmium 1.10E-03	Chromium 1.40E-03	Manganese 3.80E-04	Nickel 2.10E-03
Potential to Emit (tons/yr)	1.51E-04	3.33E-04	4.24E-04	1.15E-04	6.36E-04

Methodology is the same as page 8.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Tables 1.4-2, 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Direct Heating Units (space heaters, air makeup units, and ovens)

Company Name: Rieter Automotive North America, Inc.
Address: 101 West Oakley Avenue, Indiana 46356
Title V Renewal: T089-17994-00013
Reviewer: ERG/BL
Date: August 8, 2007

Heat Input Capacity
MMBtu/hr
58.6

Potential Throughput
MMSCF/yr
503

Pollutant

	PM*	PM10*	SO2	NOx**	VOC	CO
Emission Factor (lb/MMSCF)	1.90	7.60	0.60	100	5.50	84.0
Potential to Emit (tons/yr)	0.48	1.91	0.15	25.1	1.38	21.1

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM combined.

**Emission factor for NOx (Uncontrolled) = 100 lb/MMSCF

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July 1998).

All emission factors are based on normal firing.

Methodology

Potential Throughput (MMSCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMSCF/1,020 MMBtu
 Potential to Emit (tons/yr) = Potential Throughput (MMSCF/yr) x Emission Factor (lb/MMSCF) x 1 ton/2,000 lbs

Appendix A: Emission Calculations
HAPs Emissions from Natural Gas Combustion
MM BTU/HR <100

Direct Heating Units (space heaters, air makeup units, and ovens)

Company Name: Rieter Automotive North America, Inc.
Address: 101 West Oakley Avenue, Indiana 46356
Title V Renewal: T089-17994-00013
Reviewer: ERG/BL
Date: August 8, 2007

HAPs - Organics

Emission Factor (lb/MMSCF)	Benzene 2.10E-03	Dichlorobenzene 1.20E-03	Formaldehyde 7.50E-02	Hexane 1.80E+00	Toluene 3.40E-03	Total HAPs
Potential to Emit (tons/yr)	5.28E-04	3.02E-04	1.89E-02	4.53E-01	8.55E-04	0.47

HAPs - Metals

Emission Factor (lb/MMSCF)	Lead 5.00E-04	Cadmium 1.10E-03	Chromium 1.40E-03	Manganese 3.80E-04	Nickel 2.10E-03
Potential to Emit (tons/yr)	1.26E-04	2.77E-04	3.52E-04	9.56E-05	5.28E-04

Methodology is the same as page 10.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Tables 1.4-2, 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Diesel Industrial Engine (200 HP and 110 HP Fire Pumps)

Company Name: Rieter Automotive North America, Inc.
Address: 101 West Oakley Avenue, Indiana 46356
Title V Renewal: T089-17994-00013
Reviewer: ERG/BL
Date: August 8, 2007

Heat Input Capacity
MMBtu/hr
0.79

Potential Throughput
MMBtu/yr
394

	Pollutant					
	PM*	PM10*	SO2	NOx**	VOC	CO
Emission Factor (lb/MMBtu)	0.31	0.31	0.29	4.41	0.35	0.95
Potential to Emit (tons/yr)	0.06	0.06	0.06	0.87	0.07	0.19

Assume PM=PM10

**Emission factor for NOx (Uncontrolled) = 100 lb/MMSCF

Emission factors are from AP-42, Chapter 3.3-Stationary Internal Combustion-Gasoline and Diesel Industrial Engines (SCC 2-02-001-02, 2-03-001-01)

All emission factors are based on normal firing.

Methodology

Potential Throughput (MMBtu/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr

Potential to Emit (tons/yr) = Potential Throughput (MMBtu/yr) x Emission Factor (lb/MMBtu) x 1 ton/2,000 lbs

Appendix A: Emission Calculations
Diesel Industrial Engine (200 HP and 110 HP Fire Pump)

Company Name: Rieter Automotive North America, Inc.
Address: 101 West Oakley Avenue, Indiana 46356
Title V Renewal: T089-17994-00013
Reviewer: ERG/BL
Date: August 8, 2007

HAPs - Organics

Emission Factor (lb/MMBtu)	Formaldehyde 1.18E-03	Benzene 9.33E-04	Acetaldehyde 7.67E-04	Toluene 4.09E-04	Xylene 2.85E-04
Potential to Emit (tons/yr)	2.33E-04	1.84E-04	1.51E-04	8.07E-05	5.62E-05

HAPs - Metals

Emission Factor (lb/MMSCF)	Acrolein 9.25E-05	Naphthalene 8.48E-05	1,3-Butadiene 3.91E-05	Total HAPs
Potential to Emit (tons/yr)	1.82E-05	1.67E-05	7.71E-06	7.48E-04

Methodology is the same as page 12.

Emission factors are from AP-42, Chapter 3.3-Stationary Internal Combustion-Gasoline and Diesel Industrial Engines (SCC 2-02-001-02, 2-03-001-01)