



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

April 16, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant
RE: Bremen Corporation / 099-18923-00033
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot 9/16/03

April 16, 2004

Mr. Ken Lutian
Bremen Corporation
510 2nd Street
Bremen, Indiana 46506

Re: 099-18923
Second Administrative Amendment to
Part 70 099-7476-00033

Dear Mr. Lutian:

Bremen Corporation was issued a Part 70 permit on December 9, 1999 for a vinyl-coated foam product manufacturing plant. A letter requesting a change was received on April 15, 2004. The change involves the transfer of the following emission units to the new adjacent location at 510 2nd Street, Bremen, Indiana that were salvaged from a fire at the existing location at 405 North Industrial Drive, Bremen, Indiana:

- (a) Two (2) spray Booths, with a maximum capacity of 12 units per hour, equipped with high volume low pressure (HVLP) spray system, with particulate overspray emissions controlled by dry filters,
- (b) Four (4) dip tanks/cleaning stations;
- (c) One (1) assembly area, with a maximum capacity of 5 units per hour;
- (d) One (1) paint mixing process; and
- (e) One (1) silk screener, with a maximum capacity of 25 units per hour.

Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

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:

New Location - 510 2nd Street, Bremen, Indiana:

- (a) One (1) spray room, known as Process 1a, consisting of two (2) manual spray booths equipped with high volume, low pressure and airless spray guns, with particulate overspray emissions controlled by dry filters. with a maximum capacity of 12 units per hour.
- (b) One (1) dip room, known as Process 2, consisting of four (4) dip tanks and one (1) cleaning station, capacity: 3,162 pounds of paint, topcoat, and cleaning blend per hour.
- (c) One (1) mixing process, known as Process 4, capacity: 12,671 pounds of coatings mixed per hour.

- (d) One (1) assembly area, known as Area 2, consisting of hand application of adhesive, exhausting to stack 13, capacity: 14.9 pounds of adhesives per hour.
- (e) One (1) final finish area, known as Area 3, consisting of one (1) automatic silk screener and one (1) manual silk screener, capacity: 25 units per hour

Existing Location -405 North Industrial Drive, Bremen, Indiana:

- (a) Three (3) automatic spray booths equipped with high volume, low pressure and airless spray guns, exhausting to dry filters and a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 32, capacity: 9,153 pounds of paint and topcoat per hour.
- (b) One (1) final finish area, known as Process 3, consisting of two (2) hand-spray painting booths equipped with airless spray guns, exhausting to dry filters and a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 32, capacity: 357 pounds of paint and topcoat per hour.
- (c) One (1) assembly area, known as Area 1, consisting of hand application of adhesive and four (4) glue spraying booths equipped with high volume, low pressure spray guns, exhausting to stack 12, capacity: 133 pounds of adhesives per hour.
- (d) One (1) Roll Coater identified as Process 5, with a maximum capacity of 106.6 pounds per hour of adhesive usage.

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

New Location - 510 2nd Street, Bremen, Indiana:

- (a) One (1) spray room, known as Process 1a, consisting of two (2) manual spray booths equipped with high volume, low pressure and airless spray guns, with particulate overspray emissions controlled by dry filters. with a maximum capacity of 12 units per hour.
- (b) One (1) dip room, known as Process 2, consisting of four (4) dip tanks and one (1) cleaning station, capacity: 3,162 pounds of paint, topcoat, and cleaning blend per hour.
- (c) One (1) mixing process, known as Process 4, capacity: 12,671 pounds of coatings mixed per hour.
- (d) One (1) assembly area, known as Area 2, consisting of hand application of adhesive, exhausting to stack 13, capacity: 14.9 pounds of adhesives per hour.
- (e) One (1) final finish area, known as Area 3, consisting of one (1) automatic silk screener and one (1) manual silk screener, capacity: 25 units per hour

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- (a) Three (3) automatic spray booths equipped with high volume, low pressure and airless spray guns, exhausting to dry filters and a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 32, capacity: 9,153 pounds of paint and topcoat per hour.
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- (c) One (1) assembly area, known as Area 1, consisting of hand application of adhesive and four (4) glue spraying booths equipped with high volume, low pressure spray guns, exhausting to stack 12, capacity: 133 pounds of adhesives per hour.

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

All conditions of the Part 70 permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0

Bremen Corporation
Bremen, Indiana
Reviewer: Aida De Guzman

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2nd Administrative Amendment 099-18923-00033

and ask for Aida De Guzman or extension (3-4972), or dial (317) 23304972.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

APD

cc: File - Marshall County
U.S. EPA, Region V
Marshall County Health Department
Northern Regional Office
Air Compliance Section Inspector - Rick Reynolds
Compliance Data Section
Administrative and Development

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Bremen Corporation
405 North Industrial Drive
Bremen, Indiana 46506**

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

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

| | |
|---|---------------------------------|
| Operation Permit No.: T 099-7476-00033 | |
| Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management | Issuance Date: December 9, 1999 |

1st Significant Permit Modification No.: 099-12119, issued on July 18, 2000;
1st Minor Permit Modification No.: 099-12291, issued August 1, 2000;
Reopening No.: 099-13409, issued on November 13, 2001;
1st Administrative Amendment No.: 099-15681, issued on April 1, 2002

| | |
|---|-------------------------------|
| 2 nd Administrative Amendment No.: 099-18923 | Pages Affected: 5, 6, 29 |
| Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Chief Permit Branch Office of Air Quality | Issuance Date: April 16, 2004 |

SECTION ASOURCE 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)]

The Permittee owns and operates a stationary vinyl-coated foam product manufacturing source.

Responsible Official: Ken Lutian
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506
Mailing Address: 405 North Industrial Drive, Bremen, Indiana 46506
Phone Number: 219-546-4238
SIC Code: 3069
County Location: Marshall
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

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

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

New Location - 510 2nd Street, Bremen, Indiana:

- (a) One (1) spray room, known as Process 1a, consisting of two (2) manual spray booths equipped with high volume, low pressure and airless spray guns, with particulate overspray emissions controlled by dry filters. with a maximum capacity of 12 units per hour.
- (b) One (1) dip room, known as Process 2, consisting of four (4) dip tanks and one (1) cleaning station, capacity: 3,162 pounds of paint, topcoat, and cleaning blend per hour.
- (c) One (1) mixing process, known as Process 4, capacity: 12,671 pounds of coatings mixed per hour.
- (d) One (1) assembly area, known as Area 2, consisting of hand application of adhesive, exhausting to stack 13, capacity: 14.9 pounds of adhesives per hour.
- (e) One (1) final finish area, known as Area 3, consisting of one (1) automatic silk screener and one (1) manual silk screener, capacity: 25 units per hour

Existing Location -405 North Industrial Drive, Bremen, Indiana:

- (a) Three (3) automatic spray booths equipped with high volume, low pressure and airless spray guns, exhausting to dry filters and a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 32, capacity: 9,153 pounds of paint and topcoat per hour.
- (b) One (1) final finish area, known as Process 3, consisting of two (2) hand-spray painting

booths equipped with airless spray guns, exhausting to dry filters and a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 32, capacity: 357 pounds of paint and topcoat per hour.

- (c) One (1) assembly area, known as Area 1, consisting of hand application of adhesive and four (4) glue spraying booths equipped with high volume, low pressure spray guns, exhausting to stack 12, capacity: 133 pounds of adhesives per hour.
- (d) One (1) Roll Coater identified as Process 5, with a maximum capacity of 106.6 pounds per hour of adhesive usage.

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) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) Two (2) natural gas fired hot water boilers, capacity: 0.28 million British thermal unit per hour, each. [326 IAC 6-2-4]

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

New Location - 510 2nd Street, Bremen, Indiana:

- (a) One (1) spray room, known as Process 1a, consisting of two (2) manual spray booths equipped with high volume, low pressure and airless spray guns, with particulate overspray emissions controlled by dry filters. with a maximum capacity of 12 units per hour.
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(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New facilities; General reduction requirements), these facilities shall use the Best Available Control Technology (BACT). Pursuant to SSM 099-10314-00033, issued on September 10, 1999, the Best Available Control Technology (BACT) for this source is the use of a catalytic oxidizer on Process 1, Process 2, Process 3 and Process 4, the use of dip coating at Process 2, the use of airless or high volume, low pressure spray guns or an application with a higher transfer efficiency at all spray applications, and the use of coatings with a maximum VOC content of 6.98 pounds per gallon of coating less water.

The catalytic oxidizer shall operate at all times when Process 1, Process 2, Process 3 and Process 4 are in operation. When operating, the catalytic incinerator shall maintain a minimum operating temperature of 550 degrees Fahrenheit or a temperature determined in the most recent stack test to maintain at least ninety-five percent (95%) overall control efficiency (capture and destruction) of