



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

June 10, 2004

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Indianapolis, Indiana 46206-6015

(317) 232-8603
(800) 451-6027
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Mr. Isidro Bastidas
Johns Manville
P.O. Box 428
Richmond, Indiana 47375

Re: 177-19135-00006
Permit Review Request

Dear Mr. Bastidas:

Johns Manville was issued a Part 70 operating permit (T177-7720-00006) on October 4, 2001 for a fiberglass insulation manufacturing plant, located at 814 Richmond Avenue, Richmond, Indiana 47374. On May 12, 2004, the Office of Air Quality (OAQ) received a letter from Johns Manville requesting clarification on the stack testing requirements for the existing production Line 6 when making unbonded products.

Line 6 produces both bonded and unbonded fiber glass. This line consists of an electric melter and a forming chamber. When making bonded products, a binder is added to the forming chamber and the bonded product is transferred to the curing and cooling facilities before being transferred to the shredding process. The unbonded products are transferred to the shredding process directly after the forming process.

Pursuant to T177-7720-00006, issued on October 4, 2001, stack testing shall be performed on Line 6 as follows within 60 days after achieving maximum production rate, but not later than 180 days after initial start-up:

- (a) Condition D.3.5 - PM/PM10, NOx, VOC, and CO emissions from the forming process while making unbonded product.
- (b) Condition D.3.5 - PM/PM10, NOx, VOC, and CO emissions for the forming, curing, and cooling processes while making bonded product.
- (c) Condition D.4.6 - PM/PM10 emissions from the baghouse, which is used to control the shredding and packaging processes.

The source stated that the manufacturing operations on Line 6 were suspended on October 10, 2000 due to the reduction in product demand. The source restarted the manufacturing operations on Line 6 in May, 2004 and requested a clarification on the stack test requirements for this line.

The source stated that they performed all the required tests for the forming, curing, cooling, and shredding and packaging processes for bonded product on November 19 and 20, 2001. Since Condition D.4.6 in T177-7720-00006, issued on October 4, 2001, does not specify that the PM/PM10 tests shall be performed for specific types of products, the PM/PM10 emissions tests conducted on November 19 and 20, 2001 for bonded product is sufficient to demonstrate compliance with Condition D.4.6. Therefore, the remaining required tests for Line 6 are the PM/PM10, NOx, VOC, and CO tests for the forming process while making unbonded product.



Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this review request to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Yu-Lien Chu, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7871 to speak directly to Ms. Chu. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,
Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

ERG/YC

cc: File - Wayne County
U.S. EPA, Region V
Wayne County Health Department
Air Compliance Section Inspector - D.J. Knotts
Compliance Data Section
Administrative and Development - Sara Cloe
Technical Support and Modeling - Michele Boner