



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 11, 2005
RE: UGN, Inc / 127-20418-00072
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval 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 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-MOD.dot 1/10/05



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January 11, 2005

Mr. Ken DeRolf
UGN, Inc.
1001 State Street
Chicago Heights, Illinois 60411

Re: 127-20418-00072
First Minor Permit Revision to
MSOP 127-16516-00072

Dear Mr. DeRolf:

UGN, Inc. was issued a minor source operating permit on April 22, 2003 for a stationary automotive polyurethane foam composite part/plastic headliner manufacturing plant. A letter requesting changes to this permit was received on November 29, 2004. Pursuant to the provisions of 326 IAC 2-6.1-6 a minor revision to this permit is hereby approved as described in the attached Technical Support Document.

1. Construction of four (4) hot molding presses (identified as HMP-1,2,3, and 4), each with a maximum throughput rate of 236 pounds of padding and fabric per hour, and using a water-based mold release agent, sprayed intermittently onto the mold surface to prevent sticking. These units will be constructed in 2004.
2. Removal of one (1) existing one (1) headliner spray line HL-2.

The following construction conditions are applicable to the proposed project:

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Pursuant to IC 13-15-5-3, this approval to construct becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, the minor source operating permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please find attach a copy of the revised permit.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Sanobar Durrani, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. 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, Chief
Permits Branch
Office of Air Quality

Attachments
ERG/SD

cc: File - Porter County
U.S. EPA, Region V
Porter County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Rick Massoels
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner



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1. Construction of four (4) hot molding presses (identified as HMP-1,2,3, and 4), each with a maximum throughput rate of 236 pounds of padding and fabric per hour, and using a water-based mold release agent, sprayed intermittently onto the mold surface to prevent sticking. These units will be constructed in 2004.
2. Removal of one (1) existing one (1) headliner spray line HL-2.

The following construction conditions are applicable to the proposed project:

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Pursuant to IC 13-15-5-3, this approval to construct becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, the minor source operating permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please find attach a copy of the revised permit.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Sanobar Durrani, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. 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.

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Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
ERG/SD

cc: File - Porter County
U.S. EPA, Region V
Porter County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Rick Massoels
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Permit Revision to a Minor Source Operating Permit

Source Background and Description

Source Name: UGN, Inc.
 Source Location: 2252 Industrial Drive, Valparaiso, Indiana 46383
 County: Porter
 SIC Code: 3714
 Operation Permit No.: 127-16516-00072
 Issued: April 22, 2002
 Minor Permit Revision No.: 127-20418-00072
 Permit Reviewer: ERG/SD

The Office of Air Quality (OAQ) has reviewed a revision application from UGN, Inc. relating to the construction and operation of four (4) hot molding presses and removal of headliner spray Line HL-2.

History

On November 29, 2004, UGN, Inc. submitted a permit revision application to IDEM, OAQ requesting permission to construct and operate four (4) hot mold presses (identified as HMP-1, 2, 3, and 4), each with a maximum throughput rate of 236 pound of padding and fabric per hour. The Permittee also requested the removal of one (1) headliner spray line HL-2 from the source.

UGN, Inc. was issued a New Construction Permit and MSOP No. 127-16516-00072 on April 22, 2003.

Existing Approvals

The source has been operating under the following air approvals:

- (a) MSOP 127-16516-00027, issued on April 22, 2003; and
- (b) First Notice Only Change No. 127-18606-00072, issued March 30, 2004.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
HMP-1	Hot Mold Press	30	1.67	10,000	100
HMP-2	Hot Mold Press	30	1.67	10,000	100
HMP-3	Hot Mold Press	30	1.67	10,000	100
HMP-4	Hot Mold Press	30	1.67	10,000	100

Recommendation

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

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

A complete application for the purposes of this review was received on November 29, 2004.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, ie. pages 1 of 1.)

Potential To Emit of the Revision

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit 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 department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	6.76
PM10	6.76
SO ₂	0.00
VOC	2.15
CO	0.00
NO _x	0.00

HAP's	Potential To Emit (tons/year)
Formaldehyde	1.08
TOTAL	1.08

Justification for Revision

This revision is being performed through a MSOP Minor Permit Revision pursuant to 326 IAC 2-6.1-6(g)(4)(A) as the potential to emit of PM and PM10 are greater than five (5) tons per year and less than twenty-five (25) tons per year.

Potential to Emit After Revision

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units after control. The control equipment is considered federally enforceable only after issuance of this Permit Revision.

Emission Unit	Potential to Emit (tons/year)						
	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
* Combustion Units	1.02	1.02	0.08	0.74	11.2	13.4	0.00
* Headliner Spray booth HL-1	10.7	10.7	0.00	0.06	0.00	0.00	0.08
* Headliner Spray Booth HL-2	21.5	21.5	0.00	0.12	0.00	0.00	0.015
* Miscellaneous Products Usage/ Parts Waster/ Clean Up Usage/ Mold Cells/ Mud Guard/ Three Cold Tank Cleaners	24.4	24.4	0.00	9.61	0.00	0.00	0.003
** Spray Booths PVC-1 and PVC-2	0.00	0.00	0.00	1.11	0.00	0.00	0.00
New Four Hot Mold Presses	6.76	6.76	0.00	2.15	0.00	0.00	1.08
Total PTE of the Entire Source after Revision	42.9	42.9	0.008	12.6	11.2	13.4	1.09
MSOP or Emission Offset Threshold Levels	< 100	<100	<100	<25	<100	<100	Less than 10 for a single HAP and 25 for any combination of HAPs.

* The potential to emit of the existing units are from the Technical Support Document (TSD) for MSOP No. 127-16516-00072, issued April 22, 2003.

** The potential to emit of the spray booths (PVC 1 and 2) is from First Notice Only Change No. 127-18606-00072, issued March 30, 2004.

After adding the four (4) hold mold presses (HMP-1, 2, 3 and 4) and removing the headliner spray booth HL-2, the potential to emit of all criteria pollutants from the entire source is still limited to less than the Title V major source thresholds. Therefore, the requirements of 326 IAC 2-7 (Part 70 Program) are not applicable to this source.

Furthermore, this modification to an existing minor stationary source is not major because the VOC emission increase is less than the Emission Offset significant levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

County Attainment Status

The source is located in Porter County.

Pollutant	Status
PM-10	Attainment
SO ₂	Unclassifiable
NO ₂	Attainment
1-hour Ozone	Severe nonattainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

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

- (1) 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. Porter County has been designated as nonattainment in Indiana for the 1-hour ozone standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
 - (2) VOC and NOx emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Porter County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Porter 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.
- (c) Fugitive Emissions
Since this type of operation is not in one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/year)
PM	42.9
PM10	42.9
SO ₂	0.08
VOC	12.6
CO	11.2
NO _x	13.4

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year.
- (b) These emissions were based on potential to emit calculations for the source (see Appendix A).

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on the potential to emit calculations for the source (see Appendix A).

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 32 IAC 20, 40 CFR Part 61, and 40 CFR Part 63) included in this modification.

State Rule Applicability - Entire Source

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

This source was constructed in 1996 and is not in 1 of 28 source categories. At construction, the source was minor for PSD. The source was modified in 2004 to add two (2) spray booths. The potential to emit of all criteria pollutants after this modification remained less than 250 tons per year. The Permittee submitted an application on November 29, 2004 requesting the addition of four (4) hot mold presses. After this modification, the potential to emit of each criteria pollutants shall remain less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-3 (Emission Offset)

The source is located in Porter County and has potential to emit of VOC less than twenty-five (25) tons per year. This modification to an existing minor stationary source is not major because the VOC emission increase is less than the Emission Offset significant levels and there are no NO_x emissions associated with this modification. Therefore, the provisions of 326 IAC 2-3 do not apply.

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

The source was constructed prior to July 27, 1997. Therefore, it was not subject to 326 IAC 2-4.1. The construction of the four (4) hot mold presses will emit less than ten (10) tons per year of a single HAP or twenty-five (25) tons per year of any combination of HAPs. Therefore, the source is not subject to the provisions of 326 IAC 2-4.1.

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

State Rule Applicability - Four (4) Hot Mold Presses

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

The four (4) hot mold presses do not have potential VOC emissions equal to or greater than twenty five (25) tons per year, each. Therefore, these facilities are not subject to the provisions of 326 IAC 8-1-6.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)
The four (4) hot mold presses located in Porter County are not subject to this rule because the total potential to emit VOC from these facilities are less than ten (10) tons per year and the potential to emit VOC from the entire source is less than twenty-five (25) tons per year.

326 IAC 6-3-2 (Particulate Emissions for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2 (Particulate Emissions for Manufacturing Processes) the particulate emissions from the four (4) hot mold presses shall not exceed 0.98 pounds per hour when operating at a process weight rate of 236 pounds per hour, each.

The pounds per hour limitation was calculated using the following equation:

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

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

Based on the potential to emit calculations, the potential to emit from these facilities is equal to 0.39 pounds per hour each, which is less than 0.98 pounds per hour as calculated above. Therefore, these facilities are in compliance with this limit.

Proposed Changes

A.2 Emissions Units and Pollution Control Equipment Summary

...

- ~~(l) One (1) headliner adhesive spray booth line (identified as HL-2), using two (2) airless spray gun robotic stations, capable of spraying 120 headliners per hour, using seventy-five (75) pounds of adhesive per hour and controlled by dry filters. This facility will be constructed in 2003.~~
- (ml) Two (2) cold tank cleaners with a combined storage capacity of 115 gallons and maximum solvent consumption of one (1) gallon per day, used for degreasing operations. These units will be constructed in 2003.
- (am) Two (2) adhesive spray booths, identified as PVC-1 and PVC-2, constructed in 2004, each with a maximum throughput rate of 100 fibrous pads per hour, using airless spray guns, and controlled by dry filters.
- (en) One (1) clean-up operation for tool and equipment, constructed in 2004, using aerosol spray cans.
- (o) Four (4) hot molding presses (identified as HMP-1,2,3, and 4) each with a maximum throughput rate of 236 pounds of padding and fabric per hour, and using a water-based mold release agent, sprayed intermittently onto the mold surface to prevent sticking. These units were constructed in 2004.**

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) Seven (7) molding cells (identified as Cell # 1 through 7), consisting of forty-four (44) injection mold carriers, with a total production of 12,481 pounds of molded polyurethane foam insulation per hour. The stacks on Cell #3 have an exhaust rate of 8,5000 acfm each. All other stacks have a flow rate of 5,000 acfm. This facility was constructed in 1996.
- (b) One (1) headliner adhesive spray line booth (identified as HL-1), using two (2) airless spray guns, capable of spraying both sides of 60 headliners per hour. This facility was constructed in 1997.
- (c) One (1) laminator press, which has a capability to handle 1.46 x 2.87 square meters for the largest part. This unit was constructed in 1997.
- (d) Three (3) water jet cutters, with a combined capacity of 60 headliners per hour. These units were constructed in 1997.
- (e) Two (2) 11,000 gallon bulk organic chemical storage tanks. These units were constructed in 1997.
- (f) Two (2) 6,000 gallon bulk organic chemical storage tanks. These units were constructed in 1997.
- (g) One (1) cold cleaner tank with a storage capacity of 20 gallons and maximum solvent consumption of one (1) gallon per day, used for degreasing operation and located in the maintenance department. This unit was installed in January, 1997.
- (h) Plant wide use of cleanup solvents and mold release agents delivered from either aerosol cans, manual spray bottles, or air atomization spray guns and use of adhesive, which is brushed on or applied with aerosol spray cans. Also, the use of solvent pumped from one closed container to another to flush adhesive delivery lines.
- (k) One (1) mudguard operation (identified as cell #9) using polyester terephthalate (PET) and latex padding with a maximum process rate of 360 pounds per hour. This facility will be constructed in 2003.
- ~~(l) One (1) headliner adhesive spray booth line (identified as HL-2), using two (2) airless spray gun robotic stations, capable of spraying 120 headliners per hour, using seventy-five (75) pounds of adhesive per hour and controlled by dry filters. This facility will be constructed in 2003.~~
- ~~(m) Two (2) cold tank cleaners with a combined storage capacity of 115 gallons and maximum solvent consumption of one (1) gallon per day, used for degreasing operations. These units will be constructed in 2003.~~
- ~~(n) Two (2) adhesive spray booths, identified as PVC-1 and PVC-2, constructed in 2004, each with a maximum throughput rate of 100 fibrous pads per hour, using airless spray guns, and controlled by dry filters.~~
- ~~(o) One (1) clean-up operation for tool and equipment, constructed in 2004, using aerosol spray cans.~~
- (o) Four (4) hot molding presses (identified as HMP-1,2,3, and 4) each with a maximum throughput rate of 236 pounds of padding and fabric per hour, and using a water-based mold release agent, sprayed intermittently onto the mold surface to prevent sticking.**

These units were constructed in 2004.

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

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(d)]

(a) Pursuant to 326 IAC 6-3-2(d):

- (a1) Particulate from the ~~two (2)~~ **one (1)** headliner spray booth lines (HL-1 ~~and HL-2~~) and spray booths PVC-1 and PVC-2, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b2) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
- (4A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (e3) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

~~Pursuant to 6-3-2(d), the dry filters shall be in operation at all times the two (2) headliner spray booth lines are in operation, in order to comply with this limit.~~

(b) Pursuant to 326 IAC 6-3-2:

Particulate emissions from the four (4) hot mold presses shall not exceed 0.98 pounds per hour when operating at a process weight rate of 236 pounds per hour, each.

The pounds per hour limitation was calculated using the following equation:

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

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

Conclusion

This permit revisions shall be subject to the conditions of the attached proposed MSOP Minor Permit Revision No. 127-20418-00072.

**Appendix A: Emission Calculations
Four (4) Molding Machines**

Company Name: UGN, Inc.
Address: 2252 Industrial Drive, Valparaiso, Indiana 46383
MPR to MSOP: 127-20418
Plt ID: 127-00072
Reviewer: ERG/SD
Date: 09-Dec-04

Emission Unit	Maximum Throughput Rate (lbs/hour)	* Emission Factor PM/PM10 (lb/ton)	PTE of PM/PM10 (lbs/hour)	PTE of PM/PM10 (lbs/hour)	** Particulate Matter Limitation (lb/hour)
HMP-1	236	3.27	0.39	1.69	0.98
HMP-2	236		0.39	1.69	
HMP-3	236		0.39	1.69	
HMP-4	236		0.39	1.69	
TOTAL				6.76	

* Emission factor of 3.27 lb per ton of plastic component is based on a stack test performed at the source on September 23, 2003.

Assume all PM emissions are equal to PM10.

PM and PM10 emission factor are filterable and condensable PM and PM10 combined.

** Calculated as per the process weight rule, 326 IAC 6-3-2.

METHODOLOGY

PTE of PM/PM10 (tons/year) = Maximum Throughput Rate (lbs/hour) * Emission Factor (lb/ton) * 1 ton/2000 lbs * 8760 hours/year * 1 ton/2000 lbs

Emission Unit	Maximum Throughput Rate (lbs/hour)	* Emission Factor VOC (lb/ton)	PTE of VOC (tons/year)	Weight % Formaldehyde	PTE of Formaldehyde (tons/year)
HMP-1	236.0	1.04	0.538	0.026%	0.27
HMP-2	236.0		0.538		0.27
HMP-3	236.0		0.538		0.27
HMP-4	236.0		0.538		0.27
TOTAL			2.15		1.08

* Emission factor of 1.04 lb VOC per ton of plastic component is based on stack test results performed at the source on September 23, 2003.

METHODOLOGY

PTE of VOC (tons/year) = Maximum Throughput Rate (lbs/hour) * Emission Factor (lb/ton) * 1 ton/2000 lbs * 8760 hours/year * 1 ton/2000 lbs