



*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: May 12, 2005  
RE: Carpenter Company / 039-20797-00086  
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 1/10/05



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

*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](http://www.in.gov/idem)

Mr. Tommy Stinson  
Carpenter Co.  
P.O. Box 2386  
Elkhart, IN 46515

May 12, 2005

Re: **039-20797-00086**  
Eighth Administrative Amendment to  
**Part 70 039-6059-00086**

Dear Mr. Stinson:

Carpenter Co. was issued a Part 70 Operating Permit on June 11, 1999, for a stationary source that produces soft block foam, chemical blending for customers, and cushion blocks. A letter requesting a change was received on February 15, 2005. Pursuant to the provisions of 326 IAC 2-7-11, the permit is hereby administratively amended as described in the attached Technical Support Document.

The amendment consists of changes to Section A.2 and D.2 of the permit based on the addition of two (2) ink solvent stamping lines, identified as EU-6.1 and EU-6.2, which will be used in conjunction with the existing three (3) adhesive stations with four (4) loop slitting process lines, identified as EU-02B. Section D.1 has been added as per Significant Permit Modification 039-17958. Section D.11 has also been added as per AA 039-17257.

The potential to emit VOC from the two (2) ink solvent stamping lines is less than the exempt levels and therefore a source modification pursuant to 326 IAC 2-7-10.5 is not required.

All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised Title V Operating Permit, with all modifications and amendments made to it, is being provided.

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 Craig J. Friederich, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

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

CJF/MES

Attachments

cc: File - Elkhart County  
U.S. EPA, Region V  
Elkhart County Health Department  
Northern Regional Office  
Air Compliance Section Inspector - Paul Karkiewicz  
Compliance Branch  
Administrative and Development Section  
Technical Support and Modeling - Michele Boner



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

## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Carpenter Co.  
 195 County Road 15 South  
 Elkhart, Indiana 46515**

(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 and 326 IAC 2-1-3.2 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 039-6059-00086	
Issued by: Original signed by Janet G. McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 11, 1999  Expiration Date: June 11, 2004
1 <sup>st</sup> Minor Source Modification 039-12641-00086	Issuance Date: October 16, 2000
1 <sup>st</sup> Significant Permit Modification 039-14225-00086	Issuance Date: August 14, 2001
1 <sup>st</sup> Reopening R039-13216-00086	Issuance Date: November 26, 2001
1 <sup>st</sup> Administrative Amendment 039-15274-00086	Issuance Date: March 5, 2002
2 <sup>nd</sup> Administrative Amendment 039-17257-00086	Issuance Date: April 23, 2003
3 <sup>rd</sup> Administrative Amendment 039-17761-00086	Issuance Date: June 16, 2003
4 <sup>th</sup> Administrative Amendment 039-17845-00086	Issuance Date: January 21, 2004
2 <sup>nd</sup> Significant Permit Modification 039-17958-00086	Issuance Date: April 12, 2004
5 <sup>th</sup> Administrative Amendment 039-18875-00086	Issuance Date: April 27, 2004
6 <sup>th</sup> Administrative Amendment 039-19327-00086	Issuance Date: October 13, 2004
7 <sup>th</sup> Administrative Amendment 039-20613-00086	Issuance Date: March 10, 2005
8 <sup>th</sup> Administrative Amendment 039-20797-00086	Pages Amended: 6, 31, 32, 46, 50, and the Table of Contents.
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 12, 2005

## TABLE OF CONTENTS

### A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

### B GENERAL CONDITIONS

- B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]
- B.2 Definitions [326 IAC 2-7-1]
- B.3 Permit Term [326 IAC 2-7-5(2)]
- B.4 Enforceability [326 IAC 2-7-7(a)]
- B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.6 Severability [326 IAC 2-7-5(5)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
- B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]
- B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)] [326 IAC 2-7-6(1)and(6)]
- B.13 Emergency Provisions [326 IAC 2-7-16]
- B.14 Permit Shield [326 IAC 2-7-15]
- B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]
- B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.18 Permit Renewal [326 IAC 2-7-4]
- B.19 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
- B.20 Permit Revision Under Economic Incentives and Other Programs
- B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]
- B.22 Operational Flexibility [326 IAC 2-7-20]
- B.23 Construction Permit Requirement [326 IAC 2]
- B.24 Inspection and Entry [326 IAC 2-7-6(2)]
- B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
- B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

### C SOURCE OPERATION CONDITIONS

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

- C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]
- C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates
- C.3 Opacity [326 IAC 5-1]
- C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.6 Fugitive Dust Emissions [326 IAC 6-4]
- C.7 Operation of Equipment [326 IAC 2-7-6(6)]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

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

- C.9 Performance Testing [326 IAC 3-6]

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

- C.10 Compliance Schedule [326 IAC 2-7-6(3)]
- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.12 Monitoring Methods [326 IAC 3]

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

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

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

**Stratospheric Ozone Protection**

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1 FACILITY OPERATION CONDITIONS - foam pouring line EU-01A/B**

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

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

**Compliance Determination Requirements**

- D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

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

- D.1.3 Record Keeping Requirements
- D.1.4 Reporting Requirements

**D.2 FACILITY OPERATION CONDITIONS - laminate line EU-02A**

**Compliance Determination Requirements**

- D.2.1 Testing Requirements [326 IAC 2-7-6(1)]

**D.3 FACILITY OPERATION CONDITIONS - adhesive stations EU-02B**

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

- D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

**Compliance Determination Requirements**

- D.3.2 Testing Requirements [326 IAC 2-7-6(1)]

**D.4 FACILITY OPERATION CONDITIONS - 12.55 mmBtu Boiler EU-03**

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

- D.4.1 Particulate Matter (PM) [326 IAC 6-2-4]

**Compliance Determination Requirements**

- D.4.2 Testing Requirements [326 IAC 2-7-6(1)]

**Record keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.4.3 Natural Gas Certification

**D.5 FACILITY CONDITIONS - bonded foam line EU-04**

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

D.5.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

**Compliance Determination Requirements**

D.5.2 Testing Requirements [326 IAC 2-7-6(1)]

**D.6 FACILITY CONDITIONS - Closed mold polyurethane foam turnstile EU-5.1, EU5.2**

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

D.6.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

D.6.2 BACT condition

**Compliance Determination Requirements**

D.6.3 Testing Requirements [326 IAC 2-7-6(1)]

**Record keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.6.4 Record Keeping Requirement

**D.7 FACILITY OPERATION CONDITIONS - Storage tanks**

**Record keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.7.1 Record Keeping Requirement

**D.8 FACILITY OPERATION CONDITIONS - Insignificant boiler**

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

D.8.1 Particulate Matter (PM) [326 IAC 6-2-4]

**Compliance Determination Requirements**

D.8.2 Testing Requirements [326 IAC 2-7-6(1)]

**D.9 FACILITY OPERATION CONDITIONS - Insignificant Degreasing**

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

D.9.1 326 IAC 8-3-2 Cold Cleaner Operations

**D.10 FACILITY OPERATION CONDITIONS - Polyurethane foam manufacturing operation**

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

D.10.1 Hazardous Air Pollutants (HAPs)

**Compliance Determination Requirements**

D.10.2 Compliance Determination, Hazardous Air Pollutant (HAP) Emission Rate Limits

**Compliance Monitoring**

D.10.3 Compliance Monitoring, Hazardous Air Pollutant (HAP) Emission Rate Limits

**Record keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.10.4 Record Keeping Requirements

**D.11 FACILITY OPERATION CONDITIONS - Non-Woven Fiber Line**

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

D.11.1 PM Emissions [326 IAC 6-3-2]

**Certification**

**Emergency/Deviation Occurrence Report**

**Quarterly Compliance Reports**

**Natural Gas-Fired Boiler Certification**

## 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)]

---

The Permittee owns and operates a stationary source that produces soft block foam, chemical blending for customers, and cushion blocks.

Responsible Official: Tommy Stinson  
Source Address: 195 Elkhart, IN 46515  
Mailing Address: P.O. Box 2386, Elkhart, IN 46515  
SIC Code: 3086, 2899  
County Location: Elkhart  
County Status: Nonattainment for Ozone based on the 8-hour standard  
Attainment for all other criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, under PSD  
Major Source, under Emission Offset  
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:

- (a) One (1) foam pouring line, identified as EU-01A/B, consisting of a mixer, tunnel, foam block cut, and slab room, maximum production is 60,000 lbs of foam per hour exhausting through vents 14, 15, 16 and vent b through k.
- (b) One (1) laminate line, identified as EU-02A, for water based adhesive lamination of plastic and urethane foam, type of application is roll coating, emissions vented to Stack V32.
- (c) Three (3) adhesive stations with four (4) loop slitting process lines, containing two (2) ink solvent stamping lines (EU-6.1 and EU-6.2), identified as EU-02B, EU-02B:AOS-No.1 will include the use of UPACO Slabond 523 acetone based adhesive and EU-02B: AOS-No.2 will utilize UPACO 3694, an acetone and heptane based adhesive, coating Polyurethane foam, type of application is HVLP, having general ventilation emissions.
- (d) One (1) boiler, identified as EU-03, fueled by natural gas, rated at 12.55 MMBtu per hour, exhausting to stack identified as V6.
- (e) One (1) bonded foam line, identified as EU-04, consisting of the following equipment:
  - 1. grinding operation,
  - 2. pneumatic conveyor system,
  - 3. storage bins,
  - 4. foam dry mixer,
  - 5. wet mixer,
  - 6. molding unit, and

7. storage operations.

- (f) Two (2) closed mold polyurethane foam turnstile production operation, identified as EU-5.1 and EU-5.2, with total of two (2) robotic high volume low pressure (HVLP) spray application, with maximum capacity of 37.0 lbs. release agent per hour, 808.30 pounds of Isocyanate and 1,550 pounds of polyols per hour, exhausting to stack V-34.
- (g) One (1) fixed roof above ground storage tank identified as MLD-1, for storage of Isocyanate, has the diameter, height and annual throughput as: 10 feet, 14 feet and 131,549 gallons per year respectively.
- (h) One (1) fixed roof above ground storage tank identified as MLD-2, for storage of Polyols-soft, has the diameter, height and annual throughput as: 10 feet, 14 feet, and 323,546 gallons per year respectively.
- (i) One (1) fixed roof above ground storage tank identified as MLD-3, for storage of Polyols-hard, has the diameter, height and annual throughput as: 10 feet, 14 feet, and 310,408 gallons per year respectively.
- (j) The following tanks are grouped into four general categories - Primary pour, Rebond pour, Molding, and Chemical Blending:

Facility Description [326 IAC 2-7-5(15)] : Primary Pour tanks EU-01

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
P1	12,500	10.5	19.5	3000	POLYOL	0	600,000
P2	12,500	10.5	19.5	3000	POLYOL	0	600,000
P3	12,500	10.5	19.5	3500	POLYOL	0	115,000
P4	12,500	10.5	19.5	3500	POLYOL	0	115,000
P5* CA	12,500	10.5	19.5	174	ISO	0.01	410,000
P6* CA	12,500	10.5	19.5	174	ISO	0.01	410,000
P7* CV	12,500	10.5	19.5	85	ABA	352	100,000
P8	4,890	8	15	NA	EMPTY	NA	0
P9	12,500	10.5	19.5	3000	POLYOL	0	130,000
P10	12,500	10.5	19.5	5000	POLYOL	0	115,000
P11	12,500	10.5	19.5	6500	POLYOL	0	150,000
P12	12,500	10.5	19.5	6500	POLYOL	0	150,000
P13	11,500	10.5	18	410	FR	NA	150,000
P14	12,000	10.5	18	NA	EMPTY	NA	0
P15	12,000	10.5	18	NA	EMPTY	NA	0
P16	12,000	10.5	18	NA	EMPTY	NA	0

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
P17	12,000	10.5	18	5000	POLYOL	0	115,000
P18	12,000	10.5	18	3000	POLYOL	0	130,000
P19	12,000	10.5	18	NA	EMPTY	NA	0
P20	12,000	10.5	18	NA	EMPTY	NA	0
P21* CA	12,000	10.5	18	174	ISO	0	410,000
P22* CA	12,000	10.5	18	174	ISO	0	410,000
P23	12,000	10.5	18	3500	POLYOL	0	115,000
P24	12,000	10.5	18	3500	POLYOL	0	115,000
P25	12,000	10.5	18	3000	POLYOL	0	600,000
P26	12,000	10.5	8	3000	POLYOL	0	600,000
P26A	3,000	8	8	3500	POLYOL	0	100,000

Notes: \* Emission control device: conservation vents (CV), Nitrogen Blanket (N2), or Carbon Absorption bed filters (CA)  
\*\* Closed system

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

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
C1	11,500	8	30.5	5000	POLYOL	0	20,000
C2	28,500	12	34	6500	POLYOL	0	250,000
C3	11,500	8	30.5	285	FR	0.2	20,000
C4	11,500	8	30.5	575	EMPTY	NA	0
C5	11,500	8	30.5	575	POLYOL	0	5,000
C6	11,500	8	30.5	575	POLYOL	0	10,000
C7	11,500	8	30.5	575	POLYOL	0	10,000
C8	11,500	8	30.5	700	POLYOL	0	10,000
C9	11,500	8	30.5	5000	POLYOL	0	10,000
C10	11,500	8	30.5	575	POLYOL	0	5,000
C11	28,500	12	34	360	POLYOL	0	150,000
C12	11,500	8	30.5	575	POLYOL	0	5,000
C13**	11,500	8	30.5	116.8	ABA	132.9	50,000
C14	11,500	8	30.5	5000	POLYOL	0	50,000

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
C15	11,500	8	30.5	5000	POLYOL	0	5,000
C16	11,500	8	30.5	575	POLYOL	0	tanks combined C16 +C17 +
C17	11,500	8	30.5	575	POLYOL	0	C18
C18	11,500	8	30.5	575	POLYOL	0	100,000
C19	28,500	12	34	360	MDI	0	150,000
C20	11,500	8	30.5	NA	EMPTY	NA	Future polyol
C21	11,500	8	30.5	360	MDI	0	20,000
C22	11,500	8	30.5	360	MDI	0	20,000
C23 externally vented	11,500	8	30.5	174	ISO	0.01	30,000
C24	11,500	8	30.5	NA	EMPTY	NA	Future polyol
C25 externally vented	28,500	12	34	500	EXTENDER	0.1	600,000
C26	11,500	8	30.5	5000	POLYOL	0	25,000
C27	11,500	8	30.5	NA	EMPTY	NA	Future polyol
C28	11,500	8	30.5	360	MDI	0	30,000
C29	11,500	8	30.5	538	BPOLYOL	0	10,000
C30	11,500	8	30.5	538	BPOLYOL	0	50,000
C31	11,500	8	30.5	538	BPOLYOL	0	10,000
C32	11,500	8	30.5	538	BPOLYOL	0	10,000
C33	11,500	8	30.5	174	A-PP	0	500,000
C34	11,500	8	30.5	2000	BPOLYOL	0	500,000
C35	11,500	8	30.5	538	BPOLYOL	0	Future polyol
C36	11,500	8	30.5	538	BPOLYOL	0	Future polyol
C37	28,500	12	34	360	MDI	0	150,000
C38**	12,000	9	41	120.8	ABA	0	10,000

Notes: \* Emission control device: conservation vent (CV), Nitrogen blanket (N2), or carbon absorption bed filters (CA)  
\*\* Closed system

Facility Description [326 IAC 2-7-5(15)] : Rebond tanks EU-4

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
R1	6,500	8	17.3	174	ISO-PP	0.01	500,000***
R2	4,000	8	10	174	ISO-PP	0.01	500,000***

Notes: \* Emission control device, CV, N2, or CA

\*\* Closed System

ISO-PP - Isocyanate Prepolymer

\*\*\* R1 and R2 cascade from one tank to the next for a TOTAL throughput of 500,000 gallons. These tanks are vented through only one (1) vent.

Facility Description [326 IAC 2-7-5(15)] : Mold Tanks EU-05

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
MLD 1	8,200	10	14	195	B POLY	0.01	131,549
MLD2	8,200	10	14	5000	BPOLY	0	323,546
MLD3	8,200	10	14	5000	ISO	0	310,408

Notes: \* Emission control device, CV, N2, or CA

\*\* Closed System

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 million Btu/hr.  
One (1) boiler, fueled by natural gas, rated at 8.36 MMBtu per hour, exhausting to a stack.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (c) One (1) Non-Woven Fiber Line with a capacity of 2500 pounds per hour. This line mechanically processes purchased fibers to produce a fiber web. These fibers are specially designed to soften at a certain temperature to "thermo bond" the fibers together which is accomplished by running the "crossed lapped" batt through 6.0 million British thermal units per hour (mmBtu/hr) natural as fired oven.

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 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

### B.2 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, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### B.4 Enforceability [326 IAC 2-7-7(a)]

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

### B.5 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.6 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.7 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.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

- (b) 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.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) 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.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, 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, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 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. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

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

Carpenter Co.  
Elkhart, Indiana  
Permit Reviewer: Peggy Zukas

Eighth Administrative Amendment 039-20797-00086  
Amended by: MES

Page 14 of 56  
OP No. T039-6059-00086

- (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 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 compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
  - (5) Any insignificant activity that has been added without a permit revision;
  - (6) 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.12 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 prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

Carpenter Co.  
Elkhart, Indiana  
Permit Reviewer: Peggy Zukas

Eighth Administrative Amendment 039-20797-00086  
Amended by: MES

Page 16 of 56  
OP No. T039-6059-00086

- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.

B.13 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, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

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

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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) 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 compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

**B.14 Permit Shield [326 IAC 2-7-15]**

---

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) 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, including any term or condition from a previously issued construction or operation permit, 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.

- (d) 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.
- (e) 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.
- (f) 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).
- (g) 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)]
- (h) 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.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 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 Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 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 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)]
- (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.18 Permit Renewal** [326 IAC 2-7-4]

- (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).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
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.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with 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  
Indianapolis, Indiana 46204
- Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule
- (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.20 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)(D)(i) 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.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(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) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

**B.22 Operational Flexibility [326 IAC 2-7-20]**

(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 approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes 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), (c)(1), and (e)(2).

- (b) 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 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 increases and decreases in emissions in 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.23 Construction Permit Requirement [326 IAC 2]**

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

**B.24 Inspection and Entry [326 IAC 2-7-6(2)]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, 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) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. 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).
- (c) IDEM, OAQ, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

<b>Entire Source</b>
----------------------

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

#### C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of VOC are less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential emissions to 250 tons per twelve (12) consecutive month period, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.

#### C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

#### C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

#### C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

#### C.5 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.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

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 emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

### C.9 Performance Testing [326 IAC 3-6]

---

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

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

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

### C.10 Compliance Schedule [326 IAC 2-7-6(3)]

---

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

### C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

---

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the 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).

**C.12 Monitoring Methods [326 IAC 3]**

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.13 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 shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) 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.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

- and
- (3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
  - (b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]  
326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.16 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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not 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.17 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), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. 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:

Carpenter Co.  
Elkhart, Indiana  
Permit Reviewer: Peggy Zukas

Eighth Administrative Amendment 039-20797-00086  
Amended by: MES

Page 31 of 56  
OP No. T039-6059-00086

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

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

- (b) The emission statement required by this permit shall be considered timely if the date post-marked 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.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;

- (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204
- (b) 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.
- (c) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (d) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (e) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

Carpenter Co.  
Elkhart, Indiana  
Permit Reviewer: Peggy Zukas

Eighth Administrative Amendment 039-20797-00086  
Amended by: MES

Page 34 of 56  
OP No. T039-6059-00086

- (f) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### **Stratospheric Ozone Protection**

#### **C.21 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)] Foam Pouring Line EU-01A/B

- (a) One (1) foam pouring line, identified as EU-01A/B, consisting of a mixer, tunnel, foam block cut, and slab room, maximum production is 60,000 lbs of foam per hour exhausting through vents 14, 15, 16 and vents b through k.

(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), BACT for the one (1) foam pouring line, identified as EU-01A/B, has been determined to be as follows:

- (a) The total VOC emissions from the one (1) foam pouring line shall be limited to no more than 38.6 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limitation is based on the following equation:

$$\text{VOC Emissions (tons/year)} = (\text{Catalyst Usage (tons/year)} \times \text{Flash Off (\%)}) + (\text{TDI Usage (tons/year)} \times \text{Flash Off (\%)})$$

- (b) The continued development of non-emitting amine catalysts for replacement of existing emitting catalysts where feasible.
- (c) The listed work practice as follows:

Storage containers used to store VOC and/or HAP containing materials shall be kept covered when not in use.

### Compliance Determination Requirements

#### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the material manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

No monitoring requirements are applicable to the foam pouring line.

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

#### D.1.3 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1(a), the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1(a).

- (1) The amount of raw material used on a monthly basis.

Records shall include inline flow meter readings of raw material usages and material safety data sheets (MSDS) necessary to verify the type and amount used.

- (2) The total VOC usage for each month; and
  - (3) The weight of VOC emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of the 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.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

One (1) laminate line, identified as EU-02A, for water based adhesive lamination of plastic and urethane foam, type of application is roll coating, emissions vented to Stack V32.

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

### Compliance Determination Requirements

#### D.2.1 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time 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.

### SECTION D.3

### FACILITY OPERATION CONDITIONS

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

Three (3) adhesive stations with four (4) loop slitting process lines, containing two (2) ink solvent stamping lines (EU-6.1 and EU-6.2), identified as EU-02B, EU-02B:AOS-No.1 will include the use of UPACO Slabond 523 acetone based adhesive and EU-02B: AOS-No.2 will utilize UPACO 3694, an acetone and heptane based adhesive, coating Polyurethane foam, type of application is HVLP, having general ventilation emissions.

(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.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM for each adhesive station shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation 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:

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

#### Compliance Determination Requirements

##### D.3.2 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

## SECTION D.4

## FACILITY OPERATION CONDITIONS

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

One (1) boiler, identified as EU-03, fueled by natural gas, rated at 12.55 MMBtu per hour, exhausting to stack identified as V6.

(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.4.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the PM emissions from the 12.55 MMBtu per hour heat input boiler shall be limited to 0.5 pounds per MMBtu heat input.

This limitation is based on the following equation:  $Pt = 1.09/Q^{0.26}$

Where: Pt = Pounds of particulate matter emitted per million Btu heat input.

Q = Total source maximum operating capacity rating in million Btu per hour heat input.

### Compliance Determination Requirement

#### D.4.2 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

#### D.4.3 Natural Gas Certification

The natural gas boiler EU-3 certification form will document compliance with condition D.4.1 when the boiler EU-3 is burning natural gas. The certification form shall be submitted quarterly to the address listed in Section C- General Reporting Requirements of this permit.

## SECTION D.5

## FACILITY OPERATION CONDITIONS

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

One (1) bonded foam line, identified as EU-04, consisting of the following equipment:

1. grinding operation,
2. pneumatic conveyor system,
3. storage bins,
4. foam dry mixer,
5. wet mixer,
6. molding unit, and
7. storage operations.

(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.5.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM for the bonded foam line shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation 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:

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

### Compliance Determination Requirements

#### D.5.2 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

## SECTION D.6

## FACILITY OPERATION CONDITIONS

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

Two (2) closed mold polyurethane foam turnstile production operation, identified as EU-5.1 and EU-5.2, with total of two (2) robotic high volume low pressure (HVLP) spray application, with maximum capacity of 37.0 lbs. release agent per hour, 808.30 pounds of Isocyanate and 1,550 pounds of polyols per hour, exhausting to stack V-34.

(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.6.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the coating booth shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation 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:

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

#### D.6.2 BACT condition

Pursuant to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements),

- (a) The high volume low pressure (HVLP) spray application shall be used all the time when two (2) closed mold polyurethane turnstile production units identified as EU-5.1 and EU -5.2 are in operation.

High volume low pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (b) The weight percentage solid content and maximum usage of mold release at the two (2) closed polyurethane turnstile production units identified as EU-5.1 and EU-5.2 with a combined maximum capacity of 400 unit per hour shall be no less than 7% and no more than 0.003 gallons per unit. This shall be equivalent or less than 32.50 tons per 12 month period from each turnstile production unit identified as EU-5.1 and EU-5.2.

Any change or modification which may increase the potential VOC emissions from the two (2) closed mold polyurethane turnstile production operation identified as EU-5.1 and EU-5.2 in this BACT analysis shall be approved by the Office of Air Quality (OAQ).

### Compliance Determination Requirements

#### D.6.3 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

**D.6.4 Record Keeping Requirement**

---

A log of information necessary to document compliance with operation permit condition D.6.2 (b) shall be maintained. These records shall be kept for at least the past 36 months period and made available upon request to the Office of Air Quality (OAQ).

**SECTION D.7 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]: Primary Pour tanks EU-01**

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
P1	12,500	10.5	19.5	3000	POLYOL	0	600,000
P2	12,500	10.5	19.5	3000	POLYOL	0	600,000
P3	12,500	10.5	19.5	3500	POLYOL	0	115,000
P4	12,500	10.5	19.5	3500	POLYOL	0	115,000
P5* CA	12,500	10.5	19.5	174	ISO	0.01	410,000
P6* CA	12,500	10.5	19.5	174	ISO	0.01	410,000
P7* CV	12,500	10.5	19.5	NA	EMPTY	NA	0
P8	4,890	8	15	NA	EMPTY	NA	0
P9	12,500	10.5	19.5	3000	POLYOL	0	130,000
P10	12,500	10.5	19.5	5000	POLYOL	0	115,000
P11	12,500	10.5	19.5	6500	POLYOL	0	150,000
P12	12,500	10.5	19.5	6500	POLYOL	0	150,000
P13	11,500	10.5	18	410	FR	NA	150,000
P14	12,000	10.5	18	NA	EMPTY	NA	0
P15	12,000	10.5	18	NA	EMPTY	NA	0
P16	12,000	10.5	18	NA	EMPTY	NA	0
P17	12,000	10.5	18	5000	POLYOL	0	115,000
P18	12,000	10.5	18	3000	POLYOL	0	130,000
P19	12,000	10.5	18	NA	EMPTY	NA	0
P20	12,000	10.5	18	NA	EMPTY	NA	0
P21* CA	12,000	10.5	18	174	ISO	0	410,000
P22* CA	12,000	10.5	18	174	ISO	0	410,000
P23	12,000	10.5	18	3500	POLYOL	0	115,000
P24	12,000	10.5	18	3500	POLYOL	0	115,000
P25	12,000	10.5	18	3000	POLYOL	0	600,000
P26	12,000	10.5	8	3000	POLYOL	0	600,000
P26A	3,000	8	8	3500	POLYOL	0	100,000

Notes: \* Emission control device: conservation vents (CV), Nitrogen Blanket (N2), or Carbon Absorption bed filters (CA)  
\*\* Closed system

**Facility Description [326 IAC 2-7-5(15)]: Chemical Blending - Tanks**

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
C1	11,500	8	30.5	5000	POLYOL	0	20,000
C2	28,500	12	34	6500	POLYOL	0	250,000
C3	11,500	8	30.5	285	FR	0.2	20,000
C4	11,500	8	30.5	575	EMPTY	NA	0
C5	11,500	8	30.5	575	POLYOL	0	5,000
C6	11,500	8	30.5	575	POLYOL	0	10,000
C7	11,500	8	30.5	575	POLYOL	0	10,000
C8	11,500	8	30.5	700	POLYOL	0	10,000
C9	11,500	8	30.5	5000	POLYOL	0	10,000
C10	11,500	8	30.5	575	POLYOL	0	5,000
C11	28,500	12	34	360	POLYOL	0	150,000
C12	11,500	8	30.5	575	POLYOL	0	5,000
C13**	11,500	8	30.5	116.8	ABA	132.9	50,000
C14	11,500	8	30.5	5000	POLYOL	0	50,000
C15	11,500	8	30.5	5000	POLYOL	0	5,000
C16	11,500	8	30.5	575	POLYOL	0	tanks combined C16 +C17 + C18
C17	11,500	8	30.5	575	POLYOL	0	
C18	11,500	8	30.5	575	POLYOL	0	
C19	28,500	12	34	360	MDI	0	150,000
C20	11,500	8	30.5	NA	EMPTY	NA	Future polyol
C21	11,500	8	30.5	360	MDI	0	20,000
C22	11,500	8	30.5	360	MDI	0	20,000
C23 externally vented	11,500	8	30.5	174	ISO	0.01	30,000
C24	11,500	8	30.5	NA	EMPTY	NA	Future polyol
C25 externally vented	28,500	12	34	500	EXTENDER	0.1	600,000
C26	11,500	8	30.5	5000	POLYOL	0	25,000
C27	11,500	8	30.5	NA	EMPTY	NA	Future polyol
C28	11,500	8	30.5	360	MDI	0	30,000
C29	11,500	8	30.5	538	BPOLYOL	0	10,000
C30	11,500	8	30.5	538	BPOLYOL	0	50,000
C31	11,500	8	30.5	538	BPOLYOL	0	10,000
C32	11,500	8	30.5	538	BPOLYOL	0	10,000
C33	11,500	8	30.5	174	A-PP	0	500,000
C34	11,500	8	30.5	2000	BPOLYOL	0	500,000
C35	11,500	8	30.5	538	BPOLYOL	0	Future polyol
C36	11,500	8	30.5	538	BPOLYOL	0	Future polyol
C37	28,500	12	34	360	MDI	0	150,000
C38**	12,000	9	41	120.8	ABA	0	10,000

Notes: \* Emission control device: conservation vent (CV), Nitrogen blanket (N2), or carbon absorption bed filters (CA)  
\*\* Closed system

**Facility Description [326 IAC 2-7-5(15)]: Rebond tanks EU-4**

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
R1	6,500	8	17.3	174	ISO-PP	0.01	500,000***
R2	4,000	8	10	174	ISO-PP	0.01	500,000***

Notes: \* Emission control device, CV, N2, or CA  
 \*\* Closed System  
 \*\*\* R1 and R2 cascade from one tank to the next for a TOTAL throughput of 500,000 gallons. These tanks are vented through only one (1) vent.

ISO-PP - Isocyanate Prepolymer

**Facility Description [326 IAC 2-7-5(15)]: Mold Tanks EU-05**

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
MLD 1	8,200	10	14	195	B POLY	0.01	131,549
MLD2	8,200	10	14	5000	BPOLY	0	323,546
MLD3	8,200	10	14	5000	ISO	0	310,408

Notes: \* Emission control device, CV, N2, or CA  
 \*\* Closed System

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

**D.7.1 Record keeping Requirement**

Pursuant to 60.116b (a) and (b) the owner or operator of each storage vessel shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the vessel for the life of the source.

## SECTION D.8

## FACILITY OPERATION CONDITIONS

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

One (1) boiler, fueled by natural gas, rated at 8.36 MMBtu per hour, exhausting to a stack.

(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.8.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the PM emissions from the 8.36 MMBtu per hour heat input boiler shall be limited to 0.6 pounds per MMBtu heat input.

This limitation is based on the following equation:  $Pt = 1.09/Q^{0.26}$

Where: Pt = Pounds of particulate matter emitted per million Btu heat input.

Q = Total source maximum operating capacity rating in million Btu per hour heat input.

### Compliance Determination Requirement

#### D.8.2 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.8.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

## SECTION D.9

## FACILITY OPERATION CONDITIONS

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

Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(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.9.1 326 IAC 8-3-2 Cold Cleaner operations

That pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) equip the cleaner with a cover;
- (b) equip the cleaner with a facility for draining cleaned parts;
- (c) close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) provide a permanent, conspicuous label summarizing the operation requirements;
- (f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

## SECTION D.10

## FACILITY OPERATION CONDITIONS

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

The entire source, including, but not limited to, the equipment in the following D Sections:

- (a) One (1) foam pouring line, identified as EU-01A/B, consisting of a mixer, tunnel, foam block cut, and slab room, maximum production is 60,000 lbs of foam per hour exhausting through vents 14, 15, 16 and vent b through k.
- (b) One (1) laminate line, identified as EU-02A, for water based adhesive lamination of plastic and urethane foam, type of application is roll coating, emissions vented to Stack V32.
- (c) Three (3) adhesive stations with four (4) loop slitting process lines, identified as EU-02B, EU-02B:AOS-No.1 will include the use of UPACO Slabond 523 acetone based adhesive and EU-02B:AOS-No.2 will utilize UPACO 3694, an acetone and heptane based adhesive, coating Polyurethane foam, type of application is HVLP, having general ventilation emissions.
- (d) One (1) boiler, identified as EU-03, fueled by natural gas, rated at 12.55 MMBtu per hour, exhausting to stack identified as V6.
- (e) One (1) bonded foam line, identified as EU-04, consisting of the following equipment:
  - (1) grinding operation,
  - (2) pneumatic conveyor system,
  - (3) storage bins,
  - (4) foam dry mixer,
  - (5) wet mixer,
  - (6) molding unit, and
  - (7) storage operations.
- (f) Two (2) closed mold polyurethane foam turnstile production operation, identified as EU-5.1 and EU-5.2, with total of two (2) robotic high volume low pressure (HVLP) spray application, with maximum capacity of 37.0 lbs. release agent per hour, 808.30 pounds of Isocyanate and 1,550 pounds of polyols per hour, exhausting to stack V-34.
- (g) Primary Pour tanks EU-01  
Chemical Blending - Tanks  
Rebond tanks EU-4  
Mold Tanks EU-05
- (h) One (1) boiler, fueled by natural gas, rated at 8.36 MMBtu per hour, exhausting to a stack.
- (i) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(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.10.1 Hazardous Air Pollutants (HAPs)

The Office of Air Quality has determined that the entire source single and combined HAP potential to emit are less than the applicable levels of 10 and 25 tons per year, respectively.

The owner or operator shall notify the OAQ prior to making any change that would cause the entire source HAP potential to emit to be greater than or equal to 10 tons per year for any single HAP or 25 tons per year for any combination of HAPs.

### **Compliance Determination**

#### **D.10.2 Compliance Determination, Hazardous Air Pollutant (HAP) Emission Rate Limits**

---

To determine compliance with the HAP limits of Condition D.10.1, the owner or operator shall, on a monthly basis, calculate the source single and combined HAP emissions in tons, utilizing information obtained from the applicable material production information and material safety data sheets (MSDS).

### **Compliance Monitoring**

#### **D.10.3 Compliance Monitoring, Hazardous Air Pollutant (HAP) Emission Rate Limits**

---

The owner or operator shall, on a monthly basis, record the single and combined HAP emissions determined in Condition D.10.2.

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

#### **D.10.4 Record Keeping Requirements**

---

To document compliance with the HAP emission limits of Condition D.10.1, the owner or operator shall maintain copies of the single and combined HAP emissions, as required in Condition D.10.3.

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

**SECTION D.11**

**FACILITY OPERATION CONDITIONS**

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

(1) One (1) Non-Woven Fiber Line with a capacity of 2500 pounds per hour. This line mechanically processes purchased fibers to produce a fiber web. These fibers are specially designed to soften at a certain temperature to “thermo bond” the fibers together which is accomplished by running the “crossed lapped” batt through 6.0 million British thermal units per hour (mmBtu/hr) natural gas fired oven.

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

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

**D.11.1 PM Emissions [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2, the PM emissions from the Non-Woven Fiber Line shall not exceed 4.76 pound per hour at a process weight rate of 2,500 pounds per hour. This allowable shall be determined 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:

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

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Carpenter Co.  
Source Address: 195 County Road 15 South, Elkhart, IN 46515  
Mailing Address: P.O. Box 2386, Elkhart, IN 46515  
Part 70 Permit No.: 039-6059-00086

**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) \_\_\_\_\_
- Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

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

**100 North Senate Avenue  
Indianapolis, Indiana 46204  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Carpenter Co.  
Source Address: 195 County Road 15 South, Elkhart, IN 46515  
Mailing Address: P.O. Box 2386, Elkhart, IN 46515  
Part 70 Permit No.: 039-6059-00086

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2
<input checked="" type="radio"/> 1. This is an emergency as defined in 326 IAC 2-7-1(12) C 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 C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<input checked="" type="radio"/> 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

**Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
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: \_\_\_\_\_

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

**Part 70 Quarterly Report**

Source Name: Carpenter Co.  
Source Address: 195 County Road 15 South, Elkhart, Indiana 46516  
Mailing Address: P.O. Box 2386, Elkhart, Indiana 46515  
Part 70 Permit No.: T 039-6059-00086  
Facility: Foam Pouring Line (EU-01A/B)  
Parameter: VOC Emission Rate  
Limit: 38.6 tons per twelve (12) consecutive month period, with compliance determined at the end of each month based on the following equation:

$$\text{VOC Emissions (tons/year)} = (\text{Catalyst Usage (tons/year)} \times \text{Flash Off (\%)}) + (\text{TDI Usage (tons/year)} \times \text{Flash Off (\%)})$$

YEAR: \_\_\_\_\_

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this quarter.
- 9 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  
COMPLIANCE DATA SECTION  
OFFICE OF AIR QUALITY**

**PART 70 OPERATING PERMIT  
NATURAL GAS-FIRED BOILER CERTIFICATION**

Source Name: Carpenter Co.  
Source Address: 195 County Road 15 South, Elkhart, IN 46515  
Mailing Address: P.O. Box 2386, Elkhart, IN 46515  
Part 70 Permit No.: T039-6059-00086

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Report period

Beginning: \_\_\_\_\_

Ending: \_\_\_\_\_

Boiler Affected  
From

Alternate Fuel  
To

Days burning alternate fuel

<u>Boiler Affected</u> <u>From</u>	<u>Alternate Fuel</u> <u>To</u>	<u>Days burning alternate fuel</u>

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

Signature:

Printed Name:

Title/Position:

Date:

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Part 70 Administrative Amendment

#### Source Background and Description

<b>Source Name:</b>	<b>Carpenter Co.</b>
<b>Source Location:</b>	<b>195 County Road 15 South, Elkhart, Indiana 46515</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3086, 2899</b>
<b>Operation Permit No.:</b>	<b>T 039-6059-00086</b>
<b>Operation Permit Issuance Date:</b>	<b>June 11, 1999</b>
<b>Administrative Amendment No.:</b>	<b>039-20797-00086</b>
<b>Permit Reviewer:</b>	<b>Craig J. Friederich</b>

The Office of Air Quality (OAQ) has reviewed an amendment application from Carpenter Co. relating to the construction and operation of the following emission units, which are included in the three (3) adhesive stations with four (4) loop slitting process lines, identified as EU-02B, EU-02B.

Two (2) ink solvent stamping lines, identified as EU-6.1 and EU-6.2, constructed in 2003, exhausting inside the building, capacity: 0.052 gallons of ink per hour, each.

#### History

On February 15, 2005, Carpenter Co. submitted an application to the OAQ requesting to add two (2) ink stamping lines to their existing plant. These ink stamping lines will be used in conjunction with the existing three (3) adhesive stations with four (4) loop slitting process lines, identified as EU-02B. Carpenter Co. was issued a Part 70 permit on June 11, 1999. A First Minor Source Modification, 039-12641-00086, was issued on October 16, 2000. Significant Permit Modifications 039-14225-00086 and 039-17958-00086, were issued on August 14, 2001, and April 12, 2004, respectively. A First Reopening, 039-13216-00086, was issued on November 26, 2001. Administrative Amendments 039-15274-00086, 039-17257-00086, 039-17761-00086, 039-17845-00086, 039-18875-00086, and 039-19327-00086 were issued on March 5, 2002, April 23, 2003, June 16, 2003, January 21, 2004, April 27, 2004, and October 13, 2004, respectively. The seventh Administrative Amendment 039-20613-00086 was issued on March 10, 2005.

On March 15, 2005, the source indicated that the pouring line and the nonwoven line, and all applicable rules, were not included in the D Section of the Part 70 Operating Permit. These Conditions were included in the in SPM 039-17958, issued April 12, 2004, and AA 039-17257, issued April 23, 2003. However, when the entire permit was subsequently submitted to the IDEM for AA 039-18875, issued April 27, 2004, these conditions were inadvertently left out. They have been added as shown in the Proposed Changes section of this document. The application for an Administrative Amendment 039-20985-00086, submitted March 18, 2005, which includes adding the pouring line and the nonwoven line, as indicated above, has been combined into this approval.

#### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the Part 70 Administrative Amendment be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on February 15, 2005.

### Emission Calculations

Emission calculations are provided on pages 1 and 2 of 2 of Appendix A of this document.

### Potential To Emit of Modification

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.

This table reflects the PTE before controls for this modification. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

<b>Pollutant</b>	<b>Potential To Emit (tons/year)</b>
PM	--
PM <sub>10</sub>	--
SO <sub>2</sub>	--
VOC	3.19
CO	--
NO <sub>x</sub>	--

<b>HAPs</b>	<b>Potential To Emit (tons/year)</b>
MEK	3.19
Chromium	0.15
TOTAL	3.34

### Justification for Modification

The Part 70 Operating permit is being modified through an Administrative Amendment. The potential to emit VOC is less than ten (10) tons per year. Therefore, a Minor Source Modification pursuant to 326 IAC 2-7-10.5(d)(3) is not required and this Administrative Amendment is being performed pursuant to 326 IAC 2-7-11.

**County Attainment Status**

The source is located in Elkhart County.

<b>Pollutant</b>	<b>Status</b>
PM <sub>2.5</sub>	attainment
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
1-Hour Ozone	maintenance attainment
8-Hour Ozone	basic nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements of Emission Offset, 326 IAC 2-3.
- (b) Elkhart County has been classified as unclassifiable or attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as surrogate for PM<sub>2.5</sub> emissions. See the State Rule Applicability for the source section.
- (c) Elkhart County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Source Status**

Existing Source PSD and Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

<b>Pollutant</b>	<b>Emissions (tons/year)</b>
PM	22.7
PM <sub>10</sub>	19.7
SO <sub>2</sub>	Negligible
VOC	181
CO	2.2
NO <sub>x</sub>	14.0

- (a) This existing source is a major stationary source because a nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (b) These emissions are based upon the Technical Support Document for Administrative Amendment 039-19327-00086, issued on October 13, 2004, and the Technical Support Document for Administrative Amendment 039-20613-00086.

**Potential to Emit of Modification After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the modification.

<b>Pollutant</b>	<b>PM (tons/yr)</b>	<b>PM<sub>10</sub> (tons/yr)</b>	<b>SO<sub>2</sub> (tons/yr)</b>	<b>VOC (tons/yr)</b>	<b>CO (tons/yr)</b>	<b>NO<sub>x</sub> (tons/yr)</b>
Proposed Modification	-	-	-	3.19	-	-
Contemporaneous Increases	-	-	-	-	-	-
Contemporaneous Decreases	-	-	-	-	-	-
Net Emissions	-	-	-	3.19	-	-
PSD or Offset Significant Level	25	15	40	40	100	40

This modification to an existing major stationary source is not major because the VOC emissions increase is less than the Emission Offset significant level. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

**Federal Rule Applicability**

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

**State Rule Applicability - Individual Facilities**

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

The potential to emit VOC from each of the two (2) ink solvent stamping lines, identified as EU-6.1 and EU-6.2, is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) are not applicable.

**Proposed Changes**

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

Change 1: The two (2) ink solvent stamping lines, identified as EU-6.1 and EU-6.2, have been added to the Sections A.2 and D.3 as shown below. Please note that a typographical error in A.2(c) has been corrected, as there are four (4) loop slitting lines and not three, as was described. The changes are as follows:

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

- (c) Three (3) adhesive stations with ~~three-four (34)~~ loop slitting process lines, **containing two (2) ink solvent stamping lines (EU-6.1 and EU-6.2)**, identified as EU-02B, EU-02B:AOS-No.1 will include the use of UPACO Slabond 523 acetone based adhesive and EU-02B:AOS-No.2 will utilize UPACO 3694, an acetone and heptane based adhesive, coating Polyurethane foam, type of application is HVLP, having general ventilation emissions.

### SECTION D.3 FACILITY OPERATION CONDITIONS

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

Three (3) adhesive stations with four (4) loop slitting process lines, **containing two (2) ink solvent stamping lines (EU-6.1 and EU-6.2)**, identified as EU-02B, EU-02B:AOS-No.1 will include the use of UPACO Slabond 523 acetone based adhesive and EU-02B:AOS-No.2 will utilize UPACO 3694, an acetone and heptane based adhesive, coating Polyurethane foam, type of application is HVLP, having general ventilation emissions.

Change 2: Section D.1, which was added in SPM 039-17958, issued April 12, 2004, was not carried over in subsequent Administrative Amendments issued to the source. Therefore, this section has been added as follows, with all subsequent D sections and conditions being re-numbered accordingly. The Quarterly Report Form was added, as shown at the end of this document. The changes are as follows:

### SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Foam Pouring Line EU-01A/B

- (a) One (1) foam pouring line, identified as EU-01A/B, consisting of a mixer, tunnel, foam block cut, and slab room, maximum production is 60,000 lbs of foam per hour exhausting through vents 14, 15, 16 and vents b through k.

(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), BACT for the one (1) foam pouring line, identified as EU-01A/B, has been determined to be as follows:

- (a) The total VOC emissions from the one (1) foam pouring line shall be limited to no more than 38.6 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limitation is based on the following equation:

**VOC Emissions (tons/year) = (Catalyst Usage (tons/year) x Flash Off (%)) + (TDI Usage (tons/year) x Flash Off (%))**

- (b) The continued development of non-emitting amine catalysts for replacement of existing emitting catalysts where feasible.**
- (c) The listed work practice as follows:**

**Storage containers used to store VOC and/or HAP containing materials shall be kept covered when not in use.**

#### **Compliance Determination Requirements**

##### **D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]**

**Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the material manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.**

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

**No monitoring requirements are applicable to the foam pouring line.**

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

##### **D.1.3 Record Keeping Requirements**

**(a) To document compliance with Condition D.1.1(a), the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1(a).**

- (1) The amount of raw material used on a monthly basis.**

**Records shall include inline flow meter readings of raw material usages and material safety data sheets (MSDS) necessary to verify the type and amount used.**

- (2) The total VOC usage for each month; and**
- (3) The weight of VOC emitted for each compliance period.**

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

##### **D.1.4 Reporting Requirements**

**A quarterly summary of the information to document compliance with Condition D.1.1(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of the 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.**

**Change 3: Section D.10 (now D.11), contained in AA 039-17257, issued April 23, 2003, was not carried over in subsequent Administrative Amendments issued to the source. Therefore, this section has been added as follows:**

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

- (a) One (1) Non-Woven Fiber Line with a capacity of 2500 pounds per hour. This line mechanically processes purchased fibers to produce a fiber web. These fibers are specially designed to soften at a certain temperature to “thermo bond” the fibers together which is accomplished by running the “crossed lapped” batt through 6.0 million British thermal units per hour (mmBtu/hr) natural gas fired oven.

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

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

**D.11.1 PM Emissions [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2, the PM emissions from the Non-Woven Fiber Line shall not exceed 4.76 pound per hour at a process weight rate of 2,500 pounds per hour. This allowable shall be determined 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:

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

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

**Part 70 Quarterly Report**

Source Name: \_\_\_\_\_ Carpenter Co.  
 Source Address: \_\_\_\_\_ 195 County Road 15 South, Elkhart, IN 46515  
 Mailing Address: \_\_\_\_\_ P.O. Box 2386, Elkhart, IN Source Name: \_\_\_\_\_  
 Part 70 Permit No.: \_\_\_\_\_ T039-6059-00086  
 Facility: \_\_\_\_\_ Foam Pouring Line, identified as EU-01A/B  
 Parameter: \_\_\_\_\_ Methylene Chloride usage  
 Limit: \_\_\_\_\_ Less than or equal to 1600 tons per 12 month consecutive period

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month Methylene Chloride usage	Previous 11 Months Methylene Chloride usage	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: \_\_\_\_\_

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

**Part 70 Quarterly Report**

**Source Name:** Carpenter Co.  
**Source Address:** 195 County Road 15 South, Elkhart, Indiana 46516  
**Mailing Address:** P.O. Box 2386, Elkhart, Indiana 46515  
**Part 70 Permit No.:** T 039-6059-00086  
**Facility:** Foam Pouring Line (EU-01A/B)  
**Parameter:** VOC Emission Rate  
**Limit:** 38.6 tons per twelve (12) consecutive month period, with compliance determined at the end of each month based on the following equation:

$$\text{VOC Emissions (tons/year)} = (\text{Catalyst Usage (tons/year)} \times \text{Flash Off (\%)}) + (\text{TDI Usage (tons/year)} \times \text{Flash Off (\%)})$$

**YEAR:** \_\_\_\_\_

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

**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.**

**Conclusion**

No construction and operation approval is required for these new facilities. However, the Part 70 Operating Permit has been revised in the attached Part 70 Administrative Amendment No. 039-20797-00086.

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name: Carpenter Co.  
Address City IN Zip: 195 County Road 15 South, Elkhart, Indiana 46515  
Permit Number: 039-20797  
Plt ID: 039-00086  
Reviewer: Craig J. Friederich/MES  
Application Date: February 15, 2005**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
<b>EU-6.1</b>																
Ink 1	6.91	100.00%	0.00%	100.0%	0.00%	0.00%	0.0410	1.00	6.91	6.91	0.28	6.80	1.24	0.00	N/A	100%
Ink 2	6.71	100.00%	0.00%	100.0%	0.00%	0.00%	0.0120	1.00	6.71	6.71	0.08	1.93	0.35	0.00	N/A	100%
<b>EU-6.2</b>																
Ink 1	6.91	100.00%	0.00%	100.0%	0.00%	0.00%	0.0410	1.00	6.91	6.91	0.28	6.80	1.24	0.00	N/A	100%
Ink 2	6.71	100.00%	0.00%	100.0%	0.00%	0.00%	0.0120	1.00	6.71	6.71	0.08	1.93	0.35	0.00	N/A	100%

PM Control Efficiency: 0.00%

<b>State Potential Emissions</b>	<b>Add worst case coating to all solvents</b>	<b>Uncontrolled</b>	<b>0.73</b>	<b>17.46</b>	<b>3.19</b>	<b>0.00</b>
		<b>Controlled</b>	<b>0.73</b>	<b>17.46</b>	<b>3.19</b>	<b>0.00</b>

METHODOLOGY

- Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)
- Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)
- Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)
- Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)
- Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)
- Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)
- Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)
- Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations**  
**HAP Emission Calculations**

**Company Name:** Carpenter Co.  
**Address City IN Zip:** 195 County Road 15 South, Elkhart, Indiana 46515  
**Permit Number:** 039-20797  
**Pit ID:** 039-00086  
**Reviewer:** Craig J. Friederich/MES  
**Application Date:** February 15, 2005

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % MEK	Weight % Chromium	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	MEK Emissions (ton/yr)	Chromium Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)
<b>EU-6.1</b>																	
Ink 1	6.91	0.041000	1.00	100.00%	6.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.24	0.07	0.00	0.00	0.00	0.00	0.00
Ink 2	6.71	0.012000	1.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.35	0.00	0.00	0.00	0.00	0.00	0.00
<b>EU-6.2</b>																	
Ink 1	6.91	0.041000	1.00	100.00%	6.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.24	0.07	0.00	0.00	0.00	0.00	0.00
Ink 2	6.71	0.012000	1.00	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.35	0.00	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions

**3.19      0.15      0.00      0.00      0.00      0.00      0.00**

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs