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

TO: Interested Parties / Applicant

DATE: March 2, 2007

RE: Flexible Foam Products / 039-22398-00055

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot 03/23/06

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

Flexible Foam Products, Inc.
1900 W. Lusher Avenue and 28652 Phillips Street
Elkhart, Indiana 46517

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

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

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 FESOP under 326 IAC 2-8.

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 2-8 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.: F039-22398-00055	
Issued by: Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: March 2, 2007 Expiration Date: March 2, 2012

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY 4
A.1 General Information [326 IAC 2-8-3(b)]
A.2 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]
A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]
A.5 FESOP Applicability [326 IAC 2-8-2]

SECTION B GENERAL CONDITIONS 6
B.1 Definitions [326 IAC 2-8-1]
B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]
B.3 Enforceability [326 IAC 2-8-6]
B.4 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]
B.5 Severability [326 IAC 2-8-4(4)]
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
B.7 Duty to Provide Information[326 IAC 2-8-4(5)(E)]
B.8 Compliance Order Issuance [326 IAC 2-8-5(b)]
B.9 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]
B.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]
B.12 Emergency Provisions [326 IAC 2-8-12]
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]
B.14 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]
B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]
B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]
B.17 Permit Renewal [326 IAC 2-8-3(h)]
B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]
B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]
B.20 Source Modification Requirement [326 IAC 2-8-11.1]
B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC13-14-2-2][IC 13-17-3-2][IC13-30-3-1]
B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]
B.23 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]
B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

SECTION C SOURCE OPERATION CONDITIONS 15

Emission Limitations and Standards [326 IAC 2-8-4(1)]
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]
C.2 Overall Source Limit [326 IAC 2-8] [326 IAC 2-2]
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(3)]
C.6 Fugitive Dust Emissions [326 IAC 6-4]
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]

Testing Requirements [326 IAC 2-8-4(3)]
C.8 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]
C.9 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]
C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
C.11 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

TABLE OF CONTENTS (Continued)

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]
C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]
C.14 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
C.15 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection
C.16 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS 20

Emission Limitations and Standards [326 IAC 2-8-4(1)]
D.1.1 Volatile Organic Compounds [326 IAC 2-8][326 IAC 8-6-1]

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 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]
D.1.3 Record Keeping Requirements
D.1.4 Reporting Requirements

FESOP Quarterly Report Form 22
Certification Form 23
Emergency Occurrence Form 24
Quarterly Deviation and Compliance Monitoring Report Form 26

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, A.3 and A.4 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 2-8-3(b)]

The Permittee owns and operates a stationary soft polyurethane foam block manufacturing plant that uses carbon dioxide as a blowing agent.

Authorized individual:	Jerry Eagon, General Manager
Source Address:	1900 W. Lusher Avenue and 28652 Phillips Street, Elkhart, Indiana 46517
Mailing Address:	1900 W. Lusher Avenue, Elkhart, Indiana 46517
General Source Phone:	(574) 294-7694
SIC Code:	3086
County Location:	Elkhart
Source Location Status:	Nonattainment for ozone under the 8-hour standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

A.2 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]

This polyurethane foam manufacturing company consists of two (2) plants:

(a) Plant 1 is located at 1900 W. Lusher Avenue, Elkhart, Indiana; and

(b) Plant 2 is located at 28652 Phillips Street, Elkhart, Indiana.

Since the two (2) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and are under common control of the same entity, they are considered one (1) source, effective from the date of issuance, October 6, 2001, of F039-14582-00055.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

(a) One (1) continuous conveyor polyurethane foam line, identified as EU01, which produces foam blocks, using carbon dioxide as the blowing agent, with a maximum capacity of 19.024 tons per hour of polyurethane, exhausting to six (6) stacks, identified as S-1, S-2, S-3, S-4, S-5, and S-6, respectively. This continuous conveyor polyurethane foam line was constructed in May 1977.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Paved or unpaved roads and parking lots with public access. [326 IAC 6-4]

(b) The following storage tanks emitting VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, and emitting HAP emissions greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting HAP emissions greater than one (1) pound per day but less than twelve and five

tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

(1) Five (5) 6,000-gallon toluene diisocyanate tanks.

(c) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

(d) Emission units with PM and PM10 emissions less than five (5) tons per year, SO_2, NOx, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:

(1) Adhesives usage at the Lusher Street plant;

(2) Adhesives usage at the Phillips Street plant.

A.5 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]

(a) This permit, F039-22398-00055, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 when furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.9 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require determining the compliance status of the source.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.11 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

(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 2-8-12.

(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 describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and Northern Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-0178 (ask for Compliance Section)
Facsimile No.: 317-233-6865
Northern Regional Office Telephone No.: 1-800-753-5519 or (219) 245-4870
Facsimile No.: (219) 245-4877

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 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 material of substantial economic value.

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

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

(a) All terms and conditions of permits established prior to F039-22398-00055 and issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 2-8-8(a)]

(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 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

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

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

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

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 46204-2251

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis which document all such changes and emissions trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

(d) 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.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]

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

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

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

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, including particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3;

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana 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.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section

D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.14 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.15 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.16 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 2-8-4(10)]:

(a) One (1) continuous conveyor polyurethane foam line, identified as EU01, which produces foam blocks, using carbon dioxide as the blowing agent, with a maximum capacity of 19.024 tons per hour of polyurethane, exhausting to six (6) stacks, identified as S-1, S-2, S-3, S-4, S-5, and S-6, respectively. This continuous conveyor polyurethane foam line was constructed in May 1977.

(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 2-8-4(1)]

D.1.1 Volatile Organic Compounds [326 IAC 2-8] [326 IAC 8-6-1]

Pursuant to 326 IAC 2-8, the usage of catalysts and toluene diisocyanate (TDI) at the continuous conveyor polyurethane foam line, identified as EU01, shall be limited such that the combined potential to emit (PTE) of VOC shall be limited to ninety-five (95) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Combined with VOC emissions from insignificant activities, the limitations in this Condition are required to limit the potential to emit of VOC for the entire source to less than 100 tons per year and will render the requirements of 326 IAC 2-7 and 326 IAC 8-6-1 not applicable.

Compliance Determination Requirements

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

Compliance with the VOC usage limitations contained in Condition D.1.1 shall be determined as follows:

(a) The Permittee shall prepare or obtain from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets or Material Safety Data Sheets (MSDS) for each catalyst used in the polyurethane foam block manufacturing operation.

(b) The VOC emissions from the polyurethane foam block manufacturing operation shall be calculated as follows:

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

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.3 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1.

(1) The amount and VOC content of each catalyst 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 amount of TDI used on a monthly basis;

(3) The total VOC usage for each month; and

(4) 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 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the Aauthorized individual@ as defined by 326 IAC 2-1.1-1(1).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Branch

FESOP Quarterly Report

Source Name: Flexible Foam Products, Inc.
Source Address: 1900 West Lusher Avenue and 28652 Phillip Street, Elkhart, Indiana 46515
Mailing Address: 1900 West Lusher Avenue, Elkhart, Indiana 46515
FESOP Permit No.: F039-22398-00055
Parameter: VOC Emissions
Limit: 95 tons per twelve (12) consecutive month period with compliance determined at the end of each month based on the following equation:

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

QUARTER:_____ YEAR: _____

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

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT CERTIFICATION

Source Name: Flexible Foam Products, Inc.
Source Address: 1900 West Lusher Avenue and 28652 Phillip Street, Elkhart, Indiana 46515
Mailing Address: 1900 West Lusher Avenue, Elkhart, Indiana 46515
FESOP Permit No.: F039-22398-00055

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

Please check what document is being certified:

Annual Compliance Certification Letter

Test Result (specify)

Report (specify)

Notification (specify)

Affidavit (specify)

Other (specify)

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

Signature:
Printed Name:
Title/Position:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Flexible Foam Products, Inc.
Source Address: 1900 West Lusher Avenue and 28652 Phillip Street, Elkhart, Indiana 46515
Mailing Address: 1900 West Lusher Avenue, Elkhart, Indiana 46515
FESOP Permit No.: F039-22398-00055

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

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

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

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe: Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Flexible Foam Products, Inc.
Source Address: 1900 West Lusher Avenue and 28652 Phillip Street, Elkhart, Indiana 46515
Mailing Address: 1900 West Lusher Avenue, Elkhart, Indiana 46515
FESOP Permit No.: F039-22398-00055

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

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked ANo deviations occurred this reporting period@.
NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by: _____

Title / Position: _____

Date:_____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	Flexible Foam Products, Inc.
Source Location:	1900 W. Lusher Ave and 28652 Phillips Street, Elkhart, Indiana 46517
County:	Elkhart
SIC Code:	3086
Operation Permit No:	F039-14582-00055
Operation Permit Issuance Date:	October 6, 2001
Permit Renewal No.:	F039-22398-00055
Permit Reviewer:	ERG/JR

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Flexible Foam Products, Inc. relating to the operation of a stationary soft polyurethane foam block manufacturing plant that uses carbon dioxide as the blowing agent.

Source Definition

This Source Definition from the previous FESOP, F039-14582-00055, issued on October 6, 2001 was incorporated into this permit as follows:

This polyurethane foam manufacturing company consists of two (2) plants:

(a) Plant 1 is located at 1900 W. Lusher Avenue, Elkhart, Indiana; and

(b) Plant 2 is located at 28652 Phillips Street, Elkhart, Indiana.

Since the two (2) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and are under common control of the same entity, they are considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

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

(a) One (1) continuous conveyor polyurethane foam line, identified as EU01, which produces foam blocks, using carbon dioxide as the blowing agent, with a maximum capacity of 19.024 tons per hour of polyurethane, exhausting to six (6) stacks, identified as S-1, S-2, S-3, S-4, S-5, and S-6, respectively. This continuous conveyor polyurethane foam line was constructed in May 1977.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted units operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Paved or unpaved roads and parking lots with public access. [326 IAC 6-4]

(b) The following storage tanks emit less than three (3) pounds per hour or fifteen (15) pounds per day of VOC, and emit greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

(1) Five (5) 6,000-gallon toluene diisocyanate tanks.

(c) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

(d) Emission units with PM and PM10 emissions less than five (5) tons per year, SO2, NOx, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:

(1) Adhesives usage at the Lusher Street plant;

(2) Adhesives usage at the Phillips Street plant.

Existing Approvals

The source has been operating under the previous FESOP F039-14582-00055, issued on October 6, 2001, with an expiration date of October 6, 2006, and the following amendments and revisions:

(a) First Administrative Amendment, 039-15167-00055, issued February 4, 2002.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been revised or removed in this FESOP:

(a) Condition D.1.1 from F039-14582-00055, issued on October 6, 2001, as amended by 039-15167-00055, issued on October 4, 2002:
Pursuant to 326 IAC 2-8, the input to the production line shall be limited to less than 95 tons of VOCs per twelve consecutive month period adjusted by the amount of non-reacting VOC. The amount of non-reacting VOC shall be based on information contained in material safety data sheets (MSDS) or other written documentation provided by the manufacturers of the VOC-containing materials.

This input limit is required to limit the potential to emit VOC to less than 95 tons per twelve consecutive month period. Compliance with this limit makes 326 IAC 2-7, 326 IAC 2-2, and 326 IAC 8-6-1 not applicable.

Revised Condition:
Pursuant to 326 IAC 2-8, the usage of catalysts and toluene diisocyanate (TDI) at the continuous conveyor polyurethane foam line, identified as EU01, shall be limited such that the combined potential to emit (PTE) of VOCs shall be limited to ninety-five (95) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Combined with VOC emissions from insignificant activities, the limitations in this condition are required to limit the potential to emit of VOC for the entire source to less than 100 tons per year and will render the requirements of 326 IAC 2-7 and 326 IAC 8-6-1 not applicable.

Reason Modified:
The condition was revised to clarify the VOC emission limitation as well as to provide flexibility in the use of different VOC-containing materials.

(b) Condition D.1.5 from F039-14582-00055, issued on October 6, 2001, as amended by 039-15167-00055, issued on October 4, 2002:

The source's potential to emit hazardous air pollutants shall comply with Condition C.1 of this permit. Condition C.1 makes 40 CFR 63, Subpart III, the standard for flexible polyurethane foam production, not applicable.

Any change or modification which increases the emissions of a single HAP to 10 tons per year or more from this facility, or a combination of HAPs to 25 tons per year from this facility, shall obtain prior approval by the Office of Air Quality (OAQ) before such change may occur. Such change may also be subject to the requirements of 326 IAC 2-4.1.

Reason not incorporated:
IDEM, OAQ has omitted Condition D.1.5 from the FESOP renewal since this condition merely repeats the requirements in Section C. The statements concerning the applicability of 40 CFR 63, Subpart III are documented in the TSD; see the Federal Rule Applicability section of this document for more information about 40 CFR 63, Subpart III applicability.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP renewal 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 administratively complete FESOP renewal application for the purposes of this review was received on December 16, 2005.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 and 2). The total PTE of the five (5) toluene diisocyanate tanks is 0.35 lbs per year of a single HAP, which was calculated using EPA TANKS 4.0 software. The emissions calculations for storage tanks were provided by the applicant and have been verified and found to be accurate and correct.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Potential to Emit (tons/yr)
PM	-
PM10	-
SO_2	-
VOC	Greater than 100
CO	-
NO_x	-

HAPs	Potential to Emit (tons/yr)
Acetaldehyde	Less than 10
Propylene Oxide	Less than 10
Ethylene Oxide	Less than 10
Toluene Diisocyanate	Less than 10
Total	Less than 25

"-" is used to denote emissions are negligible.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP.

	Potential To Emit (tons/year)						
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_x	HAPs
Polyurethane Foam Production	--	--	--	Less than 95*	--	--	0.81
Insignificant Activities	--	--	--	Less than 5	--	--	--
Total Emissions	--	---	--	Less than 100	--	--	0.81

"--" is used to denote that the process/emission unit does not emit the associated pollutant.

*The usage of catalysts and toluene diisocyanate (TDI) at the continuous conveyor polyurethane foam line, identified as EU01, shall be limited such that the combined potential to emit (PTE) of VOC shall be limited to ninety-five (95) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO_2	Attainment
NO_2	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

Note: On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

(a) Elkhart County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability - Entire Source section.

(b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx 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 NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

(c) Elkhart County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	Less than 250
PM10	Less than 250
SO_2	Less than 250
VOC	Less than 100
CO	Less than 250
NO_x	Less than 100
Single HAP	<10
Combination HAPs	<25

(a) This existing source is not a major stationary source for PSD because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.

(b) This existing source is not a major stationary source for Emission Offset because no nonattainment pollutant is emitted at a rate of 100 tons per year or greater.

Federal Rule Applicability

(a) The requirements of 40 CFR 60, Subpart Kb-Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for which construction, reconstruction, or modification commenced after July 23, 1984 are not included in this permit. The five (5) insignificant toluene diisocyanate tanks each have a capacity less than 75 m^3.

(b) The requirements of 40 CFR 63, Subpart III - National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production are not included in this permit for the continuous conveyor polyurethane foam line, identified as EU01, because this source is not a major source of Hazardous Air Pollutants (HAPs). The source eliminated the use of a HAP-based (methylene chloride) adhesive from their process prior to the compliance date of October 8, 2001.

(c) The requirements of 40 CFR 63, Subpart MMMMM - National Emission Standards for Hazardous Air Pollutants: Flexible Polyurethane Foam Fabrication Operations are not included in this permit because this source is not a major source of Hazardous Air Pollutants (HAPs). The source eliminated the use of a HAP-based (methylene chloride) adhesive from their process prior to the compliance date of April 14, 2004.

(d) The requirements of 40 CFR 63, Subpart WWWW - National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production are not included in this permit because the source does not perform reinforced plastic composites production and is not a major source of Hazardous Air Pollutants (HAPs).

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The continuous conveyor polyurethane foam line, identified as EU01, was constructed in May 1977 and does not emit more than 250 tons per year of any criteria pollutant; therefore, 326 IAC 2-2 does not apply.

326 IAC 2-3 (Emission Offset)

On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties, and one partial county, nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Elkhart County has been designated as nonattainment for the 8-hour ozone standard.

Since no modifications have been completed since the effective date of the 8-hour ozone standard, this source is not subject to 326 IAC 2-3. Furthermore, the source has accepted federally enforceable limits on VOC such that the amount of VOC emitted is limited to less than one hundred (100) tons per year. The potential emissions of all other pollutants for this source are less than 250 tons per year. Therefore, this source remains a minor source under 326 IAC 2-3 (Emission Offset).

326 IAC 2-4.1 (New Source Toxics Control)

This source has not constructed or reconstructed a facility or process that is a major source of HAP after July 27, 1997. Therefore, this source is not subject to 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because the source is located in Elkhart County, and is not required to operate under the Part 70 Permit program.

326 IAC 2-8-4 (FESOP)

The source has a potential to emit VOC that is above the Title V applicability threshold. However, actual emissions are less than the Title V applicability threshold; therefore, the source qualifies as a FESOP source. The source has agreed to accept a VOC usage limit to avoid the requirements of the Part 70 Operating Permit Program.

Pursuant to 326 IAC 2-8, the usage of catalysts and toluene diisocyanate (TDI) at the continuous conveyor polyurethane foam line, identified as EU01, shall be limited such that the combined potential to emit (PTE) of VOCs shall be limited to ninety-five (95) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Combined with VOC emissions from insignificant activities, the limitations in this condition are required to limit the potential to emit of VOC for the entire source to less than 100 tons per year and will render the requirements of 326 IAC 2-7 and 326 IAC 8-6-1 not applicable.

326 IAC 5-1 (Opacity Limitations)

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

Pursuant to 326 IAC 6-5-1(a), this rule does not apply to this source because it is not located in a nonattainment area for particulate matter and pursuant to 326 IAC 6-5-1(b), there has been no new source of fugitive particulate matter emissions since December 13, 1985.

326 IAC 8-6 (Organic Solvent Emission Limitation)

This rule does not apply to this source because the source agreed to accept a VOC usage limit such that potential emissions are less than one hundred (100) tons VOC per year.

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

This rule does not apply to the continuous conveyor polyurethane foam line, identified as EU01 or the adhesive application, because particulate emissions are not generated from the continuous conveyor polyurethane foam line.

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

The continuous conveyor polyurethane foam line, identified as EU01 and the adhesive application are not subject to the provisions of 326 IAC 8-1-6 because these facilities were constructed prior to January 1, 1980, the effective date of this rule.

326 IAC 8-5 (Miscellaneous Operations)

This rule does not apply to the continuous conveyor polyurethane foam line, identified as EU01 or the adhesive application, because these facilities were constructed prior to the effective date(s) of these rules and are not one of the types described in 326 IAC 8-5.

Testing Requirements

Emissions are calculated based on catalyst usage and the percent flash off provided by the manufacturer of the raw materials. Testing is not necessary because the source will keep monthly records of the amount of raw material used.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs, IDEM, OAQ in conjunction with the source must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the approporiate corrective actions within a specific time period.

There are no compliance monitoring requirements applicable to this source.

Conclusion

The operation of this stationary soft polyurethane foam block manufacturing plant that uses carbon dioxide as a blowing agent shall be subject to the conditions of FESOP 039-22398-00055.

Appendix A: VOC Emissions Calculations

Source Name: Flexible Foam Products, Inc.
Source Location: 1900 W. Lusher Avenue and 28652 Phillips Street
County: Elkhart
FESOP: 039-22398-00055
Reviewer: ERG/JR
Date: 4/11/2006

Potential Emissions

Material Name	Material Density (lbs/gal)	Weight % VOC	VOC Content (lbs/gal)	Emission Factor (% of VOC Emitted[1])	Material Usage (gals/ton foam)	Max. Foam Production Capacity (tons/hr)	PTE of VOC[6] (tons/yr)
Polyol[2] F-3040	8.51	0.0033%	0.0003	100%	158	19.0	3.70
TDI[3]	10.2	100%	10.2	0.0009%	65.1	19.0	0.50
Flame Retardant PBR	15.7	0%	0.00	100%	3.50	19.0	0.00
Silicone[4] Additive	8.50	25.6%	2.18	1.0%	0.34	19.0	0.62
Catalyst[5] A 1	7.51	100%	7.51	70.0%	0.128	19.0	56.2
Catalyst[5] A33	8.60	100%	8.60	33.0%	0.207	19.0	49.0
						TOTAL	110

Insignificant VOC emissions from adhesives usage accounts for 5 tons per year PTE of VOC.

Notes:

1 The % VOC emitted is the % which is not consumed by the reaction which forms polyurethane.

2 The emissions from polyol are trace VOC impurities listed in the MSDS. F-3040 is the worst case of several types of polyol used.

3 The % of TDI (toluene diisocyanate) emitted is based on EPA and OSHA studies.

4 Silicone Additive - 99% of VOCs in this additive react and are not emitted per the manufacturer.

5 Both catalysts are a blend of dipropylene glycol and amines. The glycol fraction, according to the manufacturer, is completely consumed by the reaction. The fractic not glycol (70% and 33% for the two catalysts, respectively) was assumed to be emitted at 100%. Both catalysts have low vapor pressures, so any emissions of unrea would be more than outweighed by the conservative assumption regarding the amine component.

6 Potential emissions are based on a maximum production of 456.6 tons of foam per day (production 24 hours per day) .

Methodology:

VOC Content (lbs/gal) = Material Density (lbs/gal) * Weight % VOC
PTE of VOC (tons/yr) = VOC Content (lbs/gal) * Emission Factor (% of VOC Emitted) * Material Usage (gals/ton foam) * Max. Foam Production Capacity (tons/hr) * 87

Appendix A: HAP Emissions Calculations

Source Name: **Flexible Foam Products, Inc.**
Source Location: **1900 W. Lusher Avenue and 28652 Phillips Street**
County: **Elkhart**
FESOP: **039-22398-00055**
Reviewer: **ERG/JR**
Date: **4/11/2006**

								PTE of HAP (tons/yr)		
Material Name	Material Density (lbs/gal)	Material Usage (gals/ton foam)	Max. Foam Production Capacity (tons/hr)	Weight % Total HAP	Ethylene Oxide (wt %)	Acetaldehyde (wt %)	Propylene Oxide (wt %)	PTE of Ethylene Oxide	PTE of Acetaldehyde	PTE of Propylene Oxide
Polyol F-3040	8.51	158	19.0	0.0008%	0.0001%	0.0002%	0.0005%	0.11	0.22	0.56
TDI	10.2	65.1	19.0	0%	No HAPs in these materials.					
Flame Retardant	15.7	3.50	19.0	0%						
Silicone Additive	8.50	0.34	19.0	0%						
NIAX Catalyst A 1	7.51	0.128	19.0	0%						
NIAX Catalyst A33	8.60	0.207	19.0	0%						

Methodology:

PTE of HAP (tons/yr) = Material Density (lbs/gal) * Material Usage (gals/ton foam) * Max. Foam Production Capacity (tons/hr) * HAP (wt %) * 8760 hrs/yr * 1 ton/2000 lbs