



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53
(317) 232-8603
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TO: Interested Parties / Applicant
DATE: January 22, 2008
RE: Momentive Performance Materials, USA Inc / 033-22847-00075
FROM: Matthew Stuckey, Deputy Branch 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, Suite N 501E, 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.dot12/03/07



Mitchell E. Daniels, Jr.
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100 North Senate Avenue
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Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Momentive Performance Materials USA Inc.
420 North Taylor Road
Garrett, Indiana 46738**

(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 provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or 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.

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.

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.

Operation Permit No.: F033-22847-00075	
Issued by/Original Signed By: Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: January 22, 2008 Expiration Date: January 22, 2013

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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 2-8-3(b)]

The Permittee owns and operates a stationary customized and specialty silicone elastomers manufacturing operation.

Source Address:	420 North Taylor Road, Garrett, Indiana 46738
Mailing Address:	420 North Taylor Road, Garrett, Indiana 46738
General Source Phone Number:	(260) 357-6161
SIC Code:	3069
County Location:	DeKalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 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:

One (1) polydimethylsiloxane mixing operation consisting of one (1) 60,000 pound bulk storage silo, constructed in 2002, and:

- (a) One (1) mixing process, identified as Mixing Process #1, constructed prior to 2002, including two (2) 2,200 pound raw material silos, one (1) transfer conveyor system, and one (1) mixer (Mixer #3), with a nominal mixer volume of 300 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting emissions outside the building;
- (b) One (1) mixing process, identified as Mixing Process #2, constructed in 2002, including one (1) 2,200 pound raw material storage silo, one (1) transfer conveyor system, and one (1) mixer (Mixer #1), with a nominal mixer volume of 500 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting emissions outside the building;
- (c) One (1) mixing process, identified as Mixing Process #3, constructed in 2002, including one (1) 2,200 pound raw material storage silo, one (1) transfer conveyor system, and one (1) mixer (Mixer #2), with a nominal mixer volume of 500 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting outside the building; and
- (d) One (1) batch mixing operation, identified as compounding, including ten (10) mixing processes:
 - (1) One (1) mixer with a nominal mixer volume of 25 gallons, identified as Mixer #11, constructed in 2005, with particulate emissions controlled by a baghouse identified as BH2, exhausting outside the building.

- (2) Two (2) mixers, identified as Mixer #4 and Mixer #9, each with a nominal mixer volume of 25 gallons, with particulate emissions for these mixers controlled by a baghouse identified as BH5 operated for industrial hygiene purposes only, exhausting inside the building; Mixer #4 and Mixer #9 were constructed prior to 2002.
- (3) Three (3) mixers with a nominal mixer volume of 50, 300, and 500 gallons, identified as Mixer #6, Mixer #12, and Mixer #10 respectively. Particulate emissions from these mixers are controlled by two (2) baghouses identified as BH5 and BH7 operated for industrial hygiene purposes only, exhausting inside the building; Mixer #6 was constructed in 2002, Mixer #10 was constructed in 2003 and Mixer #12 was constructed in 2006. Mixing operations include two (2) bag dump stations and two (2) bulk bag unloading units.
- (4) One (1) 500-gallon mixer (identified as LSR Mixer #1), two (2) 50-gallon mixers (identified as LSR Mixers #2 and #4), and one (1) 10-gallon mixer (identified as LSR Mixer #3). Particulate emissions from each mixer are controlled by a baghouse identified as BH3, which exhausts inside the building. LSR Mixer #4 was constructed in 2005; all other mixers were constructed in 2004.

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

This stationary source also includes the following insignificant activities:

- (a) Two (2) 30-gallon recirculating, self-contained parts washer dip tanks. These degreasing operations do not exceed 145 gallons per 12 months; including
 - (1) One (1) degreasing operation is located in the Maintenance Area and was constructed on or before 1999 and modified in 2001 [326 IAC 8-3-2][326 IAC 8-3-5].
 - (2) One (1) degreasing operation is located in the Custom LSR Area and was constructed in 2005 [326 IAC 8-3-2][326 IAC 8-3-5].
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. These gas-fired heaters are used to heat the building.
- (c) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (d) Closed loop heating and cooling systems.
- (e) Laboratory and research and development activities as defined in 326 IAC 2-7-1(21)(D).

A.4 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, F033-22847-00075, 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 an "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 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.9 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 July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.10 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.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (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 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, 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 Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or

Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865

Northern Regional Office phone: (574) 245-4870; fax: (574) 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
MC 61-53 IGCN 1003
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 an "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 F033-22847-00075 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (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 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 Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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 an "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 Federally Enforceable State Operating 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "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 2-8-3. 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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 2-8 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(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 the source that are described in 326 IAC 2-8-15(b) through (d) 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 2-8-11.1 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
MC 61-53 IGCN 1003
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 emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make 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 2-8-15(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][IC 13-30-3-1]

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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(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

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]

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] [362 IAC 2-2]

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, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limit renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.
- (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) 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.

(c) 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]

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).

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
MC 61-52 IGCN 1003
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 an "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
MC 61-53 IGCN 1003
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 an "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 an "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 within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), 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.

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.13 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.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal

or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.15 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 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.16 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.17 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 an "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
MC 61-53 IGCN 1003
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 an "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.18 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 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

One (1) polydimethylsiloxane mixing operation consisting of one (1) 60,000 pound bulk storage silo, constructed in 2002, and:

- (a) One (1) mixing process, identified as Mixing Process #1, constructed prior to 2002, including two (2) 2,200 pound raw material silos, one (1) transfer conveyor system, and one (1) mixer (Mixer #3), with a nominal mixer volume of 300 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting emissions outside the building;
- (b) One (1) mixing process, identified as Mixing Process #2, constructed in 2002, including one (1) 2,200 pound raw material storage silo, one (1) transfer conveyor system, and one (1) mixer (Mixer #1), with a nominal mixer volume of 500 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting emissions outside the building;
- (c) One (1) mixing process, identified as Mixing Process #3, constructed in 2002, including one (1) 2,200 pound raw material storage silo, one (1) transfer conveyor system, and one (1) mixer (Mixer #2), with a nominal mixer volume of 500 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting outside the building; and
- (d) One (1) batch mixing operation, identified as compounding, including ten (10) mixing processes:
 - (1) One (1) mixer with a nominal mixer volume of 25 gallons, identified as Mixer #11, constructed in 2005, with particulate emissions controlled by a baghouse identified as BH2, exhausting outside the building.
 - (2) Two (2) mixers, identified as Mixer #4 and Mixer #9, each with a nominal mixer volume of 25 gallons, with particulate emissions for these mixers controlled by a baghouse identified as BH5 operated for industrial hygiene purposes only, exhausting inside the building; Mixer #4 and Mixer 9 were constructed prior to 2002.
 - (3) Three (3) mixers with a nominal mixer volume of 50, 300, and 500 gallons, identified as Mixer #6, Mixer #12, and Mixer #10 respectively. Particulate emissions from these mixers are controlled by two (2) baghouses identified as BH5 and BH7 operated for industrial hygiene purposes only, exhausting inside the building; Mixer #6 was constructed in 2002, Mixer #10 was constructed in 2003 and Mixer #12 was constructed in 2006. Mixing operations include two (2) bag dump stations and two (2) bulk bag unloading units.
 - (4) One (1) 500-gallon mixer (identified as LSR Mixer #1), two (2) 50-gallon mixers (identified as LSR Mixers #2 and #4), and one (1) 10-gallon mixer (identified as LSR Mixer #3). Particulate emissions from each mixer are controlled by a baghouse identified as BH3, which exhausts inside the building. LSR Mixer #4 was constructed in 2005; all other mixers were constructed in 2004.

(The information describing the process contained in this emissions unit 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 (VOC) [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the total VOC generating material input to each of the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation), including their associated clean-up activities, shall be limited such that the potential to emit (PTE) VOC from each facility shall not exceed 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.1.2 FESOP Limits [326 IAC 2-8]

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

- (a) The input of each individual HAP generating material to the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation), including their associated clean-up activities, shall be limited such that the combined potential to emit (PTE) any single HAP shall not exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit will limit source-wide individual HAP emissions to less than 10 tons per twelve (12) consecutive month period.
- (b) The total HAP generating material input to the mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation), including their associated clean-up activities, shall be limited such that the combined potential to emit (PTE) total HAP shall not exceed 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit will limit source-wide total HAP emissions to less than 25 tons per twelve (12) consecutive month period.
- (c) The total VOC generating material input to the mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation), including their associated clean-up activities, shall be limited such that the total potential to emit (PTE) VOC from the mixing operations shall not exceed 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit will limit source-wide total VOC emissions to less than 100 tons per twelve (12) consecutive month period.
- (d) The allowable PM10 emission rate from each mixing process shall be limited by the following:

Mixer #	Description	Control Description	PM10 Limit (lbs/hr)
1	Mixer #1 (Mixing Process 2)	BH2	1.15
2	Mixer #2 (Mixing Process 3)	BH2	1.15
3	Mixer #3 (Mixing Process 1)	BH2	0.89
4	Compounding Mixer #4	BH5	0.51
6	Compounding Mixer #6	BH5 and BH7	1.52
9	Compounding Mixer #9	BH5	0.86
10	Compounding Mixer #10	BH5 and BH7	6.42
11	Compounding Mixer #11	BH2	0.54
12	Compounding Mixer #12	BH5 and BH7	4.03
LSR 1	LSR Mixer #1	BH3	1.66
LSR 2	LSR Mixer #2	BH3	0.45
LSR 3	LSR Mixer #3	BH3	0.55
LSR 4	LSR Mixer #4	BH3	0.45
Silo	Material Loading	Bin Filter	2.54

Compliance with these limits will render 326 IAC 2-7 not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) from the following units shall be limited by the equation following this table:

Mixer #	Description
1	Mixer #1 (Mixing Process 2)
2	Mixer #2 (Mixing Process 3)
3	Mixer #3 (Mixing Process 1)
4	Compounding Mixer #4
6	Compounding Mixer #6
9	Compounding Mixer #9
10	Compounding Mixer #10
11	Compounding Mixer #11
12	Compounding Mixer #12
LSR 1	LSR Mixer #1
LSR 2	LSR Mixer #2
LSR 3	LSR Mixer #3
LSR 4	LSR Mixer #4
Silo	Material Loading

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:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
 P = process weight rate in tons per hour

- (b) Pursuant to 326 IAC 6-3-2(e)(2), the potential PM emissions from Mixer #11 and Mixer LSR 3 shall be less than 0.551 pounds per hour.

The process weight rates are considered confidential; therefore, the individual limitations are included in an IDEM, OAQ confidential file.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each mixing process and the control devices identified as BH2 and BH3.

Compliance Determination Requirements

D.1.5 Particulate Control

In order to comply with Condition D.1.3, the baghouses identified as BH2 and BH3 for particulate control shall be in operation and control emissions at all times when solid material is being added to a mixer or when solid material is being blended into a mixer.

D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutant (HAP) Emissions Determination

Compliance with Conditions D.1.1 and D.1.2 shall be determined by calculating the VOC and HAP emissions associated with each mixing operations using the following equation:

$$E = \sum_{i=1}^{i=n} [P_i \times EF_i \times 1 / 2000]$$

where:

E = Total HAP or VOC potential to emit in tons

i = Single HAP or VOC producing material

P = Usage of HAP or VOC producing material in pounds

EF = HAP or VOC generation rate for each HAP or VOC producing material (pounds HAP and/or VOC generated per pound of ingredient) as determined by empirical calculations.

The total VOC and HAP emissions (ton/month) from mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation) is equal to the sum of the VOC and HAP emissions associated with each mixer.

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

D.1.7 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouses identified as BH2 and BH3 shall be performed during normal daylight operations when the mixing processes 1, 2, and 3, and the compounding operation are in operation. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (b) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.8 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses (identified as BH2 and BH3) used in conjunction with the process, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2 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 and HAP limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The total weight of each VOC generating material used at each mixing process 1, 2, and 3, and the compounding operation each calendar month, as determined utilizing the equation specified in Condition D.1.6. Records shall indicate the specific mixing operation where the material was used.
 - (2) The total VOC generating material input and the potential to emit (PTE) VOC for each compliance period. If the combined PTE of VOC in the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation) is less than 25 tons per twelve (12) consecutive month period, the Permittee may document compliance with Condition D.1.1 using a combined total for the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation).
 - (3) The total weight of each HAP generating material used by mixing processes 1, 2, and 3, and the compounding operation each calendar month, as determined utilizing the equation specified in Condition D.1.6. Records shall indicate the specific mixing operation where the material was used.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of daily visible emission notations of the baghouses identified as BH2 and BH3 once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain a daily record

of the pressure drop across the baghouse controlling the process. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

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

D.1.10 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) If the combined VOC usage in the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation) including associated clean-up activities, is less than 25 tons per twelve (12) consecutive month period, the Permittee may document compliance with Conditions D.1.1 and D.1.2(c) using a combined total for the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) 30-gallon recirculating, self-contained parts washer dip tanks. These degreasing operations do not exceed 145 gallons per 12 months; including
- (1) One (1) degreasing operation is located in the Maintenance Area and was constructed on or before 1999 and modified in 2001 [326 IAC 8-3-2][326 IAC 8-3-5].
 - (2) One (1) degreasing operation is located in the Custom LSR Area and was constructed in 2005 [326 IAC 8-3-2][326 IAC 8-3-5].

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the Permittee shall operate the degreasing operations in compliance with the following:

- (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.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32)

millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for cold cleaning facility construction of which commenced after July 1, 1990, the Permittee shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Momentive Performance Materials USA Inc.
Source Address: 420 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738
FESOP Permit No.: F033-22847-00075

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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Momentive Performance Materials USA Inc.
Source Address: 420 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738
FESOP Permit No.: F033-22847-00075

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• 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) working 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

Page 2 of 2

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 DATA SECTION

FESOP Quarterly Report

Source Name: Momentive Performance Materials USA Inc.
Source Address: 420 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738
FESOP Permit No.: F033-22847-00075
Facility: Mixing process 1
Parameter: Total VOC generating material input
Limit: The total VOC generating material input to Mixing process 1, including associated clean-up activities, shall be limited such that the potential to emit (PTE) VOC shall not exceed 25 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

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 DATA SECTION**

FESOP Quarterly Report

Source Name: Momentive Performance Materials USA Inc.
Source Address: 420 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738
FESOP Permit No.: F033-22847-00075
Facility: Mixing process 2
Parameter: Total VOC generating material input
Limit: The total VOC generating material input to Mixing process 2, including associated clean-up activities, shall be limited such that the potential to emit (PTE) VOC shall not exceed 25 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

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 DATA SECTION**

FESOP Quarterly Report

Source Name: Momentive Performance Materials USA Inc.
Source Address: 420 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738
FESOP Permit No.: F033-22847-00075
Facility: Mixing process 3
Parameter: Total VOC generating material input
Limit: The total VOC generating material input to Mixing process 3, including associated clean-up activities, shall be limited such that the potential to emit (PTE) VOC shall not exceed 25 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

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 DATA SECTION**

FESOP Quarterly Report

Source Name: Momentive Performance Materials USA Inc.
Source Address: 420 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738
FESOP Permit No.: F033-22847-00075
Facility: Compounding operation
Parameter: Total VOC generating material input
Limit: The total VOC generating material input to the compounding operation, including associated clean-up activities, shall be limited such that the potential to emit (PTE) VOC shall not exceed 25 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

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 DATA SECTION

FESOP Quarterly Report

Source Name: Momentive Performance Materials USA Inc.
 Source Address: 420 North Taylor Road, Garrett, Indiana 46738
 Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738
 FESOP Permit No.: F033-22847-00075
 Facility: The four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation)
 Parameter: Total VOC generating material input
 Limit: The total VOC generating material input to the mixing operations (identified as mixing processes 1, 2, and 3 and the compounding operation), including their associated clean-up activities, shall be limited such that the potential to emit (PTE) shall not exceed 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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 DATA SECTION

FESOP Quarterly Report

Source Name: Momentive Performance Materials USA Inc.
Source Address: 420 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738
FESOP Permit No.: F033-22847-00075
Facility: The four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation)
Parameter: Total HAP generating material input
Limit: The total HAP generating material input to the mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation), including their associated clean-up activities, shall be limited such that the combined potential to emit (PTE) total HAP shall not exceed 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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 DATA SECTION**

FESOP Quarterly Report

Source Name: Momentive Performance Materials USA Inc.
Source Address: 420 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738
FESOP Permit No.: F033-22847-00075
Facility: The four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation)
Parameter: The input of each individual HAP generating material
Limit: The input of each individual HAP generating material to the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation), including their associated clean-up activities, shall be limited such that the combined potential to emit (PTE) any single HAP shall not exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

Source Name: Momentive Performance Materials USA Inc.
Source Address: 420 North Taylor Road, Garrett, Indiana 46738
Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738
FESOP Permit No.: F033-22847-00075

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

Page 1 of 2

<p>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. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does 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 "No deviations occurred this reporting period".</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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 Renewal

Source Background and Description

Source Name:	Momentive Performance Materials USA Inc.
Source Location:	420 N Taylor Road, Garrett, Indiana 46738
County:	DeKalb
SIC Code:	3069
Permit Renewal No.:	F033-22847-00075
Permit Reviewer:	ERG/BL

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Momentive Performance Materials USA Inc. relating to the operation of a customized and specialty silicone elastomers manufacturing operation.

History

On March 24, 2006, Momentive Performance Materials USA Inc. submitted an application to the OAQ requesting to renew its operating permit. Momentive Performance Materials USA Inc. has been operating under the previous FESOP 033-14394-00075 issued on January 2, 2002. The Fifth Administrative Amendment # 033-24080-00075 issued February 1, 2007 changed the source name from American Silicones, Inc. to Momentive Performance Materials USA Inc.

Permitted Emission Units and Pollution Control Equipment

One (1) polydimethylsiloxane mixing operation consisting of one (1) 60,000 pound bulk storage silo, constructed in 2002, and:

- (a) One (1) mixing process, identified as Mixing Process #1, constructed prior to 2002, including two (2) 2,200 pound raw material silos, one (1) transfer conveyor system, and one (1) mixer (Mixer #3), with a nominal mixer volume of 300 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting emissions outside the building;
- (b) One (1) mixing process, identified as Mixing Process #2, constructed in 2002, including one (1) 2,200 pound raw material storage silo, one (1) transfer conveyor system, and one (1) mixer (Mixer #1), with a nominal mixer volume of 500 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting emissions outside the building;
- (c) One (1) mixing process, identified as Mixing Process #3, constructed in 2002, including one (1) 2,200 pound raw material storage silo, one (1) transfer conveyor system, and one (1) mixer (Mixer #2), with a nominal mixer volume of 500 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting outside the building; and
- (d) One (1) batch mixing operation, identified as compounding, including ten (10) mixing processes:

- (1) One (1) mixer with a nominal mixer volume of 25 gallons, identified as Mixer #11, constructed in 2005, with particulate emissions controlled by a baghouse identified as BH2, exhausting outside the building.
- (2) Two (2) mixers, identified as Mixer #4 and Mixer #9, each with a nominal mixer volume of 25 gallons, with particulate emissions for these mixers controlled by a baghouse identified as BH5 operated for industrial hygiene purposes only, exhausting inside the building; Mixer #4 and Mixer 9 were constructed prior to 2002.
- (3) Three (3) mixers with a nominal mixer volume of 50, 300, and 500 gallons, identified as Mixer #6, Mixer #12, and Mixer #10 respectively. Particulate emissions from these mixers are controlled by two (2) baghouses identified as BH5 and BH7 operated for industrial hygiene purposes only, exhausting inside the building; Mixer #6 was constructed in 2002, Mixer #10 was constructed in 2003 and Mixer #12 was constructed in 2006. Mixing operations include two (2) bag dump stations and two (2) bulk bag unloading units.
- (4) One (1) 500-gallon mixer (identified as LSR Mixer #1), two (2) 50-gallon mixers (identified as LSR Mixers #2 and #4), and one (1) 10-gallon mixer (identified as LSR Mixer #3). Particulate emissions from each mixer are controlled by a baghouse identified as BH3, which exhausts inside the building. LSR Mixer #4 was constructed in 2005; all other mixers were constructed in 2004.

Insignificant Activities

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

- (a) Two (2) 30-gallon recirculating, self-contained parts washer dip tanks. These degreasing operations do not exceed 145 gallons per 12 months; including
 - (1) One (1) degreasing operation is located in the Maintenance Area and was constructed on or before 1999 and modified in 2001 [326 IAC 8-3-2][326 IAC 8-3-5].
 - (2) One (1) degreasing operation is located in the Custom LSR Area and was constructed in 2005 [326 IAC 8-3-2][326 IAC 8-3-5].
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. These gas-fired heaters are used to heat the building.
- (c) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (d) Closed loop heating and cooling systems.
- (e) Laboratory and research and development activities as defined in 326 IAC 2-7-1(21)(D).

Existing Approvals

Since the issuance of the FESOP # 033-14394-00075 on January 2, 2002, the source has constructed or has been operating under the following approvals:

- (a) AA 033-17295-00075 issued on March 17, 2003;
- (b) AA 033-18444-00075 issued on February 11, 2004;

- (c) AA 033-19599-00075 issued on November 18, 2004;
- (d) RR 033-20793-00075 issued on February 25, 2005;
- (e) EX 033-21720-00075 issued September 29, 2005; and
- (f) AA 033-24080-00075 issued on February 1, 2007.

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 in this FESOP Renewal:

Condition D.1.1 in FESOP Permit 033-14394-00075, issued January 2, 2002 limited the Mixing Process 1, Mixing Process 2, Mixing Process 3, and the small mixing operation, each, to less than or equal to 24.7 tons per twelve (12) consecutive month period, rolled on a monthly basis to render 326 IAC 8-1-6 and 326 IAC 2-7 not applicable.

At the request of the Permittee, those limits have been adjusted as follows:

The limits to render the requirements of 326 IAC 8-1-6 not applicable are documented in F033-22847-00075 condition D.1.1. The total VOC input to each of the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation), including their associated clean-up activities, shall be limited such that the potential to emit (PTE) VOC from each facility shall be less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

The limits to render the requirements of 326 IAC 2-8 not applicable are documented in F033-22847-00075 condition D.1.2. The total VOC input to the mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation), including their associated clean-up activities, shall be limited such that the total potential to emit (PTE) VOC shall not exceed 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the pneumatic bin filter system be considered an integral part of the 60,000 bulk storage silo. The bulk storage silo is filled by pumping material with a double diaphragm pump into the storage silo. The air displaced during the filling process is exhausted through the bin filter along with a small amount of nitrogen used to fluidize the material during pumping. Without the filter, raw material would be exhausted from the silo.

The bin filter system should be considered integral to the normal operation of the bulk storage silo. Based on a total initial capital cost of the silo bin vent filter, the total operating costs of the silo bin vent filter, the hours of silo loading (533 per year), an uncontrolled silo emission rate, and a material unit cost, the value of the recovered material is greater than the cost of controls (including operating expenses).

IDEM, OAQ has evaluated the justifications and agreed that the pneumatic bin filter system will be considered an integral part of the storage silo. Therefore, the permitting level will be determined using the potential to emit after the bin filter. Operating conditions in the proposed permit will specify that this bin filter shall operate at all times when the storage silo is filling. Additional details including the value of the filter and recovery rate are included in an IDEM, OAQ confidential file because this information is considered confidential.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

Source wide emissions are above 326 IAC 2-2 major source thresholds with the potential to emit greater than two hundred fifty (250) tons per year of VOC. Source wide emissions are above Section 112 of the CAA major source thresholds with the potential to emit ten (10) tons per year or more of any hazardous air pollutant. Source wide emissions are above twenty-five (25) tons per year or more of any combination of such hazardous air pollutants.

The permit includes limits that reduce VOC and HAP emissions below 326 IAC 2-2 and Section 112 thresholds. Momentive Performance Materials USA Inc. has claimed production information including the names and quantities of ingredients used, batch sizes, cycle times and production rates as confidential. IDEM, OAQ agrees with these claims of confidentiality and no calculations are provided in the TSD.

County Attainment Status

The source is located in DeKalb County.

Pollutant	Status
PM ₁₀	Attainment
PM _{2.5}	Attainment
SO ₂	Attainment
NO _x	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) DeKalb County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x emissions are considered when evaluating the rule applicability relating to ozone. DeKalb County has been designated as attainment or unclassifiable for the 8-hour ozone standard. Therefore, VOC emissions and NO_x 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.
- (c) DeKalb County has been classified as attainment or unclassifiable in Indiana for SO₂, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

- (d) 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.
- (e) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	greater than 100 and less than 250
PM10	greater than 100 and less than 250
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

HAPs	tons/year
Methanol	greater than 10
Total	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC and PM10 are greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source will limit its VOC and PM10 emissions to less than Title V levels; therefore, the source will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of Methanol (a Hazardous Air Pollutant (HAP)) is greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is greater than twenty-five (25) tons per year. However, the source will limit its single HAP emissions and total HAP emissions below Title V limits. Therefore, the source will be issued a FESOP.
- (d) Pursuant to 326 IAC 2-7-2(e), all fugitive emissions are included in the determination of Part 70 applicability.

Actual Emissions

No previous emission data has been received from the source.

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.

Process/emission unit	Potential To Emit (tons/year)						HAPs
	PM	PM-10	SO ₂	VOC	CO	NO _x	
Mixing processes 1	3.88	3.88	-	< 90.0 **	-	-	Single HAP = 9.00** Total HAP = 24.0
Mixing processes 2	5.05	5.05	-		-	-	
Mixing processes 3	5.05	5.05	-		-	-	
Compounding Operation	74.4	74.4	-		-	-	
Material Loading	11.1	11.1	-	-	-	-	
Insignificant Combustion	0.08	0.33	0.03	0.24	3.61	4.29	Total HAP = 0.08
Total Emissions	99.6	99.9	0.03	< 100	3.61	4.29	Single HAP = < 10 Total HAP = < 25

"-" = Negligible

* Particulate emissions for the batch mixers, conveyors, and material loading are limited by 326 IAC 6-3 and 326 IAC 2-2. The batch mixers shall be controlled with a baghouse.

** Pursuant to 326 IAC 2-8-4, ingredient materials used by the four (4) mixing operations shall be limited such that total HAP emissions shall not exceed 24 tons of total HAP, 9.0 tons of individual HAP, and 90.0 tons of VOC per year.

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 fugitive emissions are not counted toward the determination of PSD applicability.

Federal Rule Applicability

- (a) The requirements of 40 CFR Part 60, Subpart DDD - NSPS for Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry (326 IAC 12) are not included in this permit because this source does not manufacture polypropylene, polyethylene, polystyrene, or poly (ethylene terephthalate) as defined in 40 CFR 60.561.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (c) The requirements of 40 CFR Part 63, Subpart U - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Group I Polymers and Resins (326 IAC 20-19) are not included in this permit because the source does not manufacture an elastomer product as defined in 40 CFR 63.482.
- (d) The requirements of 40 CFR Part 63, Subpart YY - NESHAP for Generic Maximum Achievable Control Technology Standards (326 IAC 20-44) are not included in this permit because this source is not one of the source categories specified in 40 CFR 63.1103(a) through (h). The source does not manufacture an acetal resins product as defined in 40 CFR 63.1103(a).
- (e) The requirements of 40 CFR Part 63, Subpart JJJ - NESHAP for Group IV Polymers and Resins (326 IAC 20-21) are not included in this permit because this source does not manufacture a thermoplastic product as defined in 40 CFR 63.1312.

- (f) The requirements of 40 CFR Part 63, Subpart XXXX - NESHAP for Rubber Tire Manufacturing (326 IAC 20-55), are not included in this permit because this source does not manufacture tires.
- (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

326 IAC 2-2 (PSD)

This existing source is not in 1 of 28 source categories defined in 326 IAC 2-2-1(gg) and there are no applicable New Source Performance Standards that were in effect on August 7, 1980. Therefore, fugitive emissions are not counted towards applicability of PSD.

On July 28, 2000, the source was issued an exemption to construct and operate a customized silicone manufacturing plant (Exemption 033-12541-00075). The source at that time consisted of two (2) silicone dioxide storage hoppers and one (1) transfer conveyor. The PM/PM10 emissions were controlled by a baghouse that exhausted inside the building. The source was a PSD minor source upon construction.

On January 2, 2002, the source was issued an initial FESOP (033-14394-00075). At that time, the potential to emit from the entire source of all criteria pollutant emissions was less than 250 tons per year. The source was again determined not to be a major PSD stationary source.

On March 17, 2003, AA 033-17295-00075 was issued for the replacement of an existing dust collection system (identified as DS1) installed on Mixing Processes #1, #2, and #3 with a new system (DS2). New dust collectors were also installed on the small batch mixing operation for industrial hygiene purposes. The industrial hygiene dust collectors met the definition of trivial activity under 326 IAC 2-7-1(40)(A)(ii). This modification did not trigger PSD review and the PSD minor source status was maintained.

On February 11, 2004, AA 033-18444-00075 was issued to the source for the installation of three (3) new mixers and a baghouse. IDEM concluded the emission units were similar to those already permitted and should comply with the same applicable requirements, permit terms and conditions as the existing units. This modification did not trigger PSD review and the PSD minor source status was maintained.

On November 18, 2004, AA 033-19599-00075 was issued to the source for the installation of two (2) new mixers and replacement of two (2) existing mixers. IDEM concluded the emission units were similar to those already permitted and should comply with the same applicable requirements, permit terms and conditions as the existing units. This modification did not trigger PSD review and the PSD minor source status was maintained.

On February 25, 2005, RR 033-20793-00075 was issued for the replacement of the existing mixer (Mixer #5) with another mixer (Mixer #9) of the same type and capacity. The Mixer #9 complies with the same applicable requirements and the source's potential to emit of regulated criteria pollutants or hazardous air pollutants did not increase. This modification did not trigger PSD review and the PSD minor source status was maintained.

On September 29, 2005, an Exemption 033-21720-00075 was issued. The Office of Air Quality (OAQ) concluded that the experimental trial of a product was classified as exempt under the provisions of 326 IAC 2-1.1-3(h)(3). The potential emissions increase in volatile organic compounds (VOC) from the modification was less than twenty-five (25) tons for the duration of the operation. This modification did not trigger PSD review and the PSD minor source status was maintained.

The FESOP renewal application for permit F033-22847-00075 contained calculations submitted by the applicant. The calculations have been verified and found to be accurate and correct. The application did not include proposed construction or modification of any new emissions units. Calculations show the stationary source has the potential to emit more than two hundred fifty (250) tons per year of VOC and is a PSD major stationary source. The source has agreed to limit the VOC emission to less than 100 tons per year. See the State Rule Applicability – Entire Source section, 326 IAC 2-8 (FESOP).

Momentive Performance Materials USA Inc. submitted an Administrative Amendment 033-23883-00075 request to replace Mixer 8 with a new mixer (Mixer 12). That request has been combined with the FESOP Renewal 033-22847-00075. This modification did not trigger PSD review and the PSD minor source status was maintained.

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

HAP emissions occur as the result of hydrolysis in the production of customized and specialty silicone elastomers. The source first began producing HAPs when the custom compounding portion of the plant began in 1989.

Although Momentive Performance Materials USA Inc. has the potential to emit greater than ten (10) tons per year of methanol and greater than twenty-five (25) tons per year of a combination of HAPs, the source will continue to operate as a FESOP because it will limit HAP emissions below Title V threshold levels.

326 IAC 2-6 (Emission Reporting)

This source is located in Dekalb County and the potential to emit of any pollutant specified in the rule is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8 (FESOP)

Pursuant to 326 IAC 2-8-4, the hazardous air pollutant (HAP), PM10, and VOC emissions from this source shall be limited as follows:

- (a) The ingredient materials used by the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation) shall be limited such that total HAP emissions shall not exceed 24 tons of HAP per twelve consecutive month period with compliance determined at the end of each month. This will limit source wide HAP emissions to less than 25 tons per twelve (12) consecutive month period.
- (b) The ingredient materials used by the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation) shall be limited such that the maximum single HAP emission from all materials used at mixing processes shall not exceed 9.0 tons of HAP per twelve consecutive month period with compliance determined at the end of each month. This will limit source wide single HAP emissions to less than 10 tons per twelve (12) consecutive month period.
- (c) The ingredient materials used in the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation) shall be limited to less than a combined total of 90.0 tons of VOC per twelve consecutive month period with compliance determined at the end of each month. This will limit source wide VOC emissions to less than 100 tons per twelve (12) consecutive month period.
- (d) The allowable PM10 emission rate from each mixing process shall be limited by the following:

Mixer #	Description	Control Description	PM10 Limit (lbs/hr)
1	Mixer #1 (Mixing Process 2)	BH2	1.15
2	Mixer #2 (Mixing Process 3)	BH2	1.15
3	Mixer #3 (Mixing Process 1)	BH2	0.89
4	Compounding Mixer #4	BH5	0.51
6	Compounding Mixer #6	BH5 and BH7	1.52
9	Compounding Mixer #9	BH5	0.86
10	Compounding Mixer #10	BH5 and BH7	6.42
11	Compounding Mixer #11	BH2	0.54
12	Compounding Mixer #12	BH5 and BH7	4.03
LSR 1	LSR Mixer #1	BH3	1.66
LSR 2	LSR Mixer #2	BH3	0.45
LSR 3	LSR Mixer #3	BH3	0.55
LSR 4	LSR Mixer #4	BH3	0.45
Silo	Material Loading	Bin Filter	2.54

To comply with these limits the baghouses identified as BH2 and BH3 for PM10 control shall be in operation and control emissions at all times when solid material is being added to a mixing tank or when solid material is being blended into a mixing tank. The pneumatic bin filter system for PM10 control shall be in operation and control emissions at all times when the bulk storage silo is being filled. The Permittee shall operate the control devices (BH2 and BH3) and bin filter system in accordance with manufacturer's specifications.

The Permittee shall track the usage of compounds that will generate VOC and HAP emissions through hydrolysis during mixing operations. VOC and HAP emissions will be computed for these compounds by assuming that hydrolysis will release the maximum quantity of VOC and HAP possible, based upon the chemical composition of the material used. The Permittee shall maintain a list of materials used that will form VOC and HAP emissions during hydrolysis as well as the theoretical VOC and HAP emission rate for each such material.

Compliance shall be determined by calculating the HAP and VOC emissions associated with each mixing operation using the following equation:

$$E = \sum_{i=1}^{i=n} [P_i \times EF_i \times 1 / 2000]$$

where:

E = Total HAP or VOC emissions in tons

i = Single HAP or VOC producing material

P = Usage of HAP or VOC producing material in pounds

EF = HAP or VOC generation rate for each HAP or VOC producing material (pounds HAP and/or VOC generated per pound of ingredient) as determined by empirical calculations.

Compliance with these limits will render the requirements of 326 IAC 2-7 and 326 IAC 2-2 not applicable with respect to HAPs and VOC.

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 the 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)

The source is located in Dekalb County and was constructed after December 13, 1985. However, the fugitive particulate emissions from the paved and unpaved roads are negligible. Pursuant to 326 IAC 6-5-1(b), this source is exempt from the requirements of 326 IAC 6-5.

State Rule Applicability – Mixing Operations

326 IAC 8-1-6 (New facilities; general reduction requirements)

There are no other 326 IAC Article 8 rules that apply to mixing processes (identified as 1, 2, and 3) and the compounding operation, and the unrestricted potential to emit from each process is greater than 25 tons per year. The source will limit the VOC emissions from each of these four (4) processes to less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

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

Pursuant to 326 IAC 6-3-2(e), the particulate from the silicone elastomer production facilities listed in the table below shall be limited by the equation following this table:

Mixer #	Description	Control Description
1	Mixer #1 (Mixing Process 2)	BH2
2	Mixer #2 (Mixing Process 3)	BH2
3	Mixer #3 (Mixing Process 1)	BH2
4	Compounding Mixer #4	BH5
6	Compounding Mixer #6	BH5
9	Compounding Mixer #9	BH5
10	Compounding Mixer #10	BH5
11	Compounding Mixer #11	BH2
12	Compounding Mixer #12	BH5
LSR 1	LSR Mixer #1	BH3
LSR 2	LSR Mixer #2	BH3
LSR 3	LSR Mixer #3	BH3
LSR 4	LSR Mixer #4	BH3
Silo	Material Loading	Bin Filter

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:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
 P = process weight rate in tons per hour

The baghouses identified as BH2 and BH3 for particulate control shall be in operation and control emissions at all times when solid material is being added to a mixing tank or when solid material is being blended into a mixing tank. The pneumatic bin filter system for particulate control shall be in operation and control emissions at all times when the bulk storage silo is being filled. The Permittee shall operate the control devices (BH2 and BH3) and the bin filter system in accordance with manufacturer's specifications.

Pursuant to 326 IAC 6-3-2(e)(2), the potential PM emissions from Mixer #11 and Mixer LSR 3 shall be less than 0.551 pounds per hour. The process weight rate for these emission units are less than 100 pounds per hour.

State Rule Applicability – Degreasing Operations

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee 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.

326 IAC 8-3 (Degreaser Operations)

Since the source operates two (2) cold cleaning degreasers that use a solvent containing VOC, were constructed after July 1, 1990, and are located in DeKalb County, the requirements of 326 IAC 8-3-5, Organic Solvent Degreasing Operations: Cold Cleaner Degreaser Operation and Control, are applicable.

The cold cleaner degreaser is not subject to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers) because it is not located in Clark, Floyd, Lake, or Porter County. The cold cleaner is not subject to 326 IAC 8-3-2 (Organic Solvent Degreasing Operations: Cold Cleaner Operation) because it does not have a remote solvent reservoir.

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

- (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Testing Requirements

Compliance testing is not required for mixing operations at this source because this permit includes record keeping requirements that will ensure compliance with VOC and HAP emission limitations.

Momentive Performance Materials USA Inc. has determined that VOC and HAP emissions are created by a hydrolysis reaction and depend on the chemical composition of the raw material used in the production of specialty silicone elastomers. The VOC and HAP emission rate for each

product will be calculated using the chemical composition of the raw materials. Emission rates are based on theoretical complete reactions.

The PM emissions for these units were calculated using AP-42 emission factors and mass balance data submitted by the Permittee. IDEM considers these emission factors reliable.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a 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 Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements 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 appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Baghouse dust collectors (BH2, BH3, and BH5)	Water Pressure Drop	Daily	2.0 and 8.0 inches	Response Steps
	Visible Emissions		Normal-Abnormal	

Baghouse dust collector identified as BH2, BH3, and BH5 shall be in operation at all times when mixing processes (identified as 1, 2, and 3) and the compounding operations are in operation. These monitoring conditions are necessary to comply with the limitations of 326 IAC 6-3-2 and 326 IAC 2-8. The Permittee shall also maintain a preventive maintenance plan.

Recommendation

The staff recommends to the Commissioner that the FESOP Permit 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 March 24, 2006.

Conclusion

The operation of this customized and specialty silicone elastomers manufacturing operation shall be subject to the conditions of the attached FESOP Renewal No. F033-22847-00075.

Appendix A: Emission Calculations
Calculation of Mixer and Conveyor 326 IAC 6-3-2 Permit Limits

Company Name: Momentive Performance Materials USA Inc.
Address: 420 North Taylor Road, Garrett, Indiana 47201
FESOP Renewal: F033-22847-00075
Reviewer: ERG/BL
Date: April 23, 2007

Mixer #	Emission Unit ID	Mixer Dust Collector
1	Mixer #1 (Mixing Process 2)	BH2
2	Mixer #2 (Mixing Process 3)	BH2
3	Mixer #3 (Mixing Process 1)	BH2
4	25-gallon mixer (Compounding)	BH5
6	50-gallon mixer (Compounding)	BH5
9	25-gallon mixer (Compounding)	BH5
10	500-gallon mixer (Compounding)	BH5
11	25-gallon mixer (Compounding)	BH2
12	300-gallon mixer (Compounding)	BH5
LSR 1	LSR Mixer #1 (Compounding)	BH3
LSR 2	LSR Mixer #2 (Compounding)	BH3
LSR 3	LSR Mixer #3 (Compounding)	BH3
LSR 4	LSR Mixer #4 (Compounding)	BH3

The individual limitations are included in an IDEM, OAQ confidential file because the process weight rates are considered confidential.

Allowable emissions under 326 IAC 6-3-2 are calculated using the following equation where the process weight rate is up to sixty thousand (60,000) pounds per hour:

$$E = 4.10 P^{0.67}$$

where

E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

**Appendix A: Emission Calculations
Natural Gas-Fired Combustion Source Emissions**

Company Name: Momentive Performance Materials USA Inc.
Address: 420 North Taylor Road, Garrett, Indiana 47201
FESOP Renewal: F033-22847-00075
Reviewer: ERG/BL
Date: April 23, 2007

Heat Input Capacity Potential Throughput
MMBtu/hr MMSCF/yr
10.0 85.9

	Pollutant						
Emission Factor (lb/MMSCF)	PM*	PM10*	SO ₂	NO _x **	VOC	CO	HAPs
Potential to Emit (tons/yr)	1.90	7.60	0.60	100	5.50	84.0	1.89
	0.08	0.33	0.03	4.29	0.24	3.61	0.08

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM combined.

**Emission factor for NO_x (Uncontrolled) = 100 lb/MMSCF

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July 1998).

All emission factors are based on normal firing.

Methodology

Potential Throughput (MMSCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMSCF/1,020 MMBtu

Potential to Emit (tons/yr) = Potential Throughput (MMSCF/yr) x Emission Factor (lb/MMSCF) x 1 ton/2,000 lbs