



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
MC 61-53 IGCN 1003  
(317) 232-8603  
(800) 451-6027  
www.IN.gov/idem

TO: Interested Parties / Applicant  
DATE: October 2, 2007  
RE: Foam Fabricators, Inc. / 043-23440-00014  
FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

### **Notice of Decision: Approval - Effective Immediately**

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

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

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

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

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

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

Enclosures  
FNPER.dot 03/23/06



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## Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Foam Fabricators, Inc.  
950 Progress Boulevard  
New Albany, Indiana 47150**

(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.: F043-23440-00014	
Issued by:  <i>Original signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: October 2, 2007  Expiration Date: October 2, 2012

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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)]

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The Permittee owns and operates a stationary plastic foam products manufacturing plant.

Source Address:	950 Progress Boulevard, New Albany, Indiana 47150
Mailing Address:	6550 West Ridge Road, Erie, PA 16506
General Source Phone Number:	812-948-1696
SIC Code:	3086
County Location:	Floyd
Source Location Status:	Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source; under PSD, and Nonattainment NSR 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)]

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

- (a) One (1) natural gas-fired boiler using No. 2 fuel oil as a back-up, identified as #1, with a maximum heat input capacity of 12.6 million British thermal units (MMBtu) per hour, exhausting to stack S#1.
- (b) Polystyrene expansion process, identified as #2, with a maximum throughput rate of 1,534 pounds of expandable polystyrene beads per hour. This process includes the following:
  - (1) Two (2) pre-expansion units, identified as #2A and #2B, exhausting through wall vents #2-A and #2-B, respectively; and
  - (2) Eighteen (18) polystyrene expansion molding machines, identified as #2C through #2T, exhausting through roof vents #2-C through #2-N.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (1) Six (6) natural gas-fired combustion units with a total heat input capacity of 0.76 million Btu per hour.
- (b) Closed loop heating and cooling systems.

- (c) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (d) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

A.4 FESOP Applicability [326 IAC 2-8-2]

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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, F043-23440-00014, 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 April 15 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]**

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- (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, 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
  - (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]**

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- (a) All terms and conditions of permits established prior to F043-23440-00014 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)]**

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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)]**

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- (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]**

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- (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)]**

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- (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]**

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- (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]

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.
- (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) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

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

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

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

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

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

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

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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]

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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]

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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 Stack Height [326 IAC 1-7]

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (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.9 Performance Testing [326 IAC 3-6]**

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- (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.10 Compliance Requirements [326 IAC 2-1.1-11]**

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

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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.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

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- (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.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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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.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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- (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.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

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

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

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- (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.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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:

- (a) One (1) natural gas-fired boiler using No. 2 fuel oil as a back-up, identified as #1, with a maximum heat input capacity of 12.6 million British thermal units (MMBtu) per hour, exhausting to stack S#1.

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

Pursuant to 326 IAC 6-2-3 (e) (Particulate emission limitations for sources of indirect heating), particulate emissions from the boiler, identified as #1, shall not exceed 0.6 pounds of particulate matter per million British thermal units heat input.

#### D.1.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-2] [326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1 -2 (SO<sub>2</sub> Emissions Limitations), the SO<sub>2</sub> emissions from the boiler shall not exceed five-tenths (0.5) pound per million Btu heat input while combusting fuel oil. Compliance shall be demonstrated on a calendar month average.

### Compliance Determination Requirements

#### D.1.3 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 3-7-4] [326 IAC 3-6]

Compliance with Condition D.1.2 shall be determined utilizing one of the following options:

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pound per million Btu heat input by:
- (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification; or
  - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
    - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
    - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

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

#### D.1.4 Visible Emissions Notations

- (a) Visible emission notations of the boiler stack exhaust shall be performed once per day during normal daylight operations while combusting fuel oil. 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.
- (d) 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 conditions 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 of this permit.

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

#### **D.1.5 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the SO<sub>2</sub> emission limit established in Condition D.1.2.
  - (1) Calendar dates covered in the compliance determination period;
  - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
  - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period. The natural gas fired boiler certification does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1); and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

  - (4) Fuel supplier certifications;
  - (5) The name of the fuel supplier; and
  - (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the boiler stack S#1 exhaust while combusting fuel oil.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.6 Reporting Requirements**

---

The Permittee shall certify, on the form provided, that natural gas was fired in the boiler at all times during each quarter. Alternatively, the Permittee shall report the number of days during which an alternate fuel was burned during each quarter.

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (b) Polystyrene expansion process, identified as #2, with a maximum throughput rate of 1,534 pounds of expandable polystyrene beads per hour. This process includes the following:
- (1) Two (2) pre-expansion units, identified as #2A and #2B, exhausting through wall vents #2-A and #2-B, respectively; and
  - (2) Eighteen (18) polystyrene expansion molding machines, identified as #2C through #2T, exhausting through roof vents #2-C through #2-N.

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

### D.2.1 Volatile Organic Compounds (VOCs) [326 IAC 2-8]

- (a) The VOC input to the polystyrene expansion process (#2) shall not exceed 140.4 tons per twelve (12) consecutive month period. This shall be based on a thirty percent (30%) VOC product retention. The monthly VOC input shall be calculated using the following equation:

$$\text{VOC input (tons/month)} = \text{amount of beads processed (tons/month)} \times \text{monthly weighted average of initial pentane content (\%)}$$

- (b) The VOC emissions from the polystyrene expansion process shall not exceed 0.7 ton per ton of VOC input.

Compliance with the VOC input limit of 140.4 tons per twelve (12) consecutive month period shall constitute compliance with the VOC limit of 0.7 ton per ton of VOC input until such time that mass balance, stack testing or other IDEM approved testing indicates otherwise. If input materials change at any time, IDEM, OAQ shall be notified, and these facilities will be subject to mass balance or stack testing and any other procedures necessary to ensure compliance with the FESOP requirements.

Compliance with this input limit will limit VOC emissions to less than 98.3 tons per year. This will limit source-wide VOC emissions to less than 100 tons per year. Therefore, 326 IAC 2-7 does not apply.

### Compliance Determination Requirements

#### D.2.2 VOC Emissions

Compliance with Condition D.2.1 shall be demonstrated within 30 days of the end of each month based on the total VOC emissions for the most recent twelve (12) month period.

#### D.2.3 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.2.1(b), the Permittee shall perform VOC testing on at least one of the expansion molding machines utilizing methods as approved by the Commissioner within 90 days of issuance of this permit. Testing shall be conducted in accordance with Section C - Performance Testing.

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

### **D.2.4 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.2.1.
- (1) Calendar month expandable polystyrene beads throughput rate;
  - (2) Monthly weighted average of the initial pentane content of the expandable polystyrene beads used;
  - (3) Calculated monthly VOC input to the polystyrene expansion process; and
  - (4) The weight of VOC input for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.2.5 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

Source Name: Foam Fabricators, Inc.  
Source Address: 950 Progress Boulevard, New Albany, Indiana 47150  
Mailing Address: 6550 West Ridge Road, Erie, PA 16506  
FESOP Permit No.: F043-23440-00014

**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: Foam Fabricators, Inc.  
Source Address: 950 Progress Boulevard, New Albany, Indiana 47150  
Mailing Address: 6550 West Ridge Road, Erie, PA 16506  
FESOP Permit No.: F043-23440-00014

**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"><li>• 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</li><li>• 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</li></ul> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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 <sub>2</sub> , VOC, NO <sub>x</sub> , 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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
SEMI- ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Foam Fabricators, Inc.  
Source Address: 950 Progress Boulevard, New Albany, Indiana 47150  
Mailing Address: 6550 West Ridge Road, Erie, PA 16506  
FESOP Permit No.: F043-23440-00014

<input type="checkbox"/> Natural Gas Only <input type="checkbox"/> Alternate Fuel burned From: _____ To: _____
----------------------------------------------------------------------------------------------------------------------

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: _____

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:** Foam Fabricators, Inc.  
**Source Address:** 950 Progress Boulevard, New Albany, Indiana 47150  
**Mailing Address:** 6550 West Ridge Road, Erie, PA 16506  
**FESOP Permit No.:** F043-23440-00014  
**Facility:** Polystyrene Expansion Process (#2)  
**Parameter:** VOC Input  
**Limit:** 140.4 tons per consecutive twelve (12) month period.

**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: Foam Fabricators, Inc.  
 Source Address: 950 Progress Boulevard, New Albany, Indiana 47150  
 Mailing Address: 6550 West Ridge Road, Erie, PA 16506  
 FESOP Permit No.: F043-23440-00014

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

<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 ΔNo deviations occurred this reporting period@.</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Quality**

Addendum to the  
Technical Support Document for a  
Federally Enforceable State Operating Permit (FESOP) Renewal

Source Name: Foam Fabricators, Inc.  
Source Location: 950 Progress Boulevard, New Albany, Indiana 47150  
County: Floyd  
SIC Code: 3086  
Operation Permit No.: F043-23440-00014  
Permit Reviewer: APT

On August 25, 2007, the Office of Air Quality (OAQ) had a notice published in the New Albany Tribune in New Albany, Indiana, stating that Foam Fabricators had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal for a stationary plastic foam products manufacturing plant. The notice also stated that OAQ proposed to issue a permit renewal for this operation and provided information on how the public could review the proposed permit renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit renewal should be issued as proposed.

Changes to the permit are noted as follows: ~~struck~~ language has been deleted; **bold** language has been added. The Table of Contents has been modified to reflect these changes.

**OAQ Change**

On September 6, 2007 the Indiana Air Pollution Control Board finalized a temporary emergency rule to redesignate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph Counties as attainment for the 8-hour ozone standard. Foam Fabricators Inc. is located in Floyd County; therefore, the nonattainment status for the 8-hour ozone standard and the Emission Offset Applicability (326 IAC 2-3) has been removed from the permit in Condition A.1 General Information as follows:

**A.1 General Information [326 IAC 2-8-3(b)]**

---

The Permittee owns and operates a stationary plastic foam products manufacturing plant.

Source Address:	950 Progress Boulevard, New Albany, Indiana 47150
Mailing Address:	6550 West Ridge Road, Erie, PA 16506
General Source Phone Number:	812-948-1696
SIC Code:	3086
County Location:	Floyd
Source Location Status:	<del>Nonattainment for 8-hour ozone standard</del> Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants

Source Status:

Federally Enforceable State Operating Permit  
Program  
Minor Source; under PSD, ~~Emission Offset  
Rules~~ and Nonattainment NSR  
Minor Source, Section 112 of the Clean Air Act  
Not 1 of 28 Source Categories

# Indiana Department of Environmental Management Office of Air Quality

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

## Source Background and Description

Source Name: Foam Fabricators, Inc.  
Source Location: 950 Progress Boulevard, New Albany, Indiana 47150  
County: Floyd  
SIC Code: 3086  
Operation Permit No.: F043-23440-00014  
Permit Reviewer: APT

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Foam Fabricators, Inc. relating to the operation of a plastic foam products manufacturing plant. Foam Fabricators, Inc. was issued a FESOP (F043-7264-00014), on July 22, 1997.

Foam Fabricators, Inc. opened the New Albany plant in 1977, and operates only one pre-expansion unit at any given time.

## Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) natural gas-fired boiler using No. 2 fuel oil as a back-up, identified as #1, with a maximum heat input capacity of 12.6 million British thermal units (MMBtu) per hour, exhausting to stack S#1.
- (b) Polystyrene expansion process, identified as #2, with a maximum throughput rate of 1,534 pounds of expandable polystyrene beads per hour. This process includes the following:
  - (1) Two (2) pre-expansion units, identified as #2A and #2B, exhausting through wall vents #2-A and #2-B, respectively and
  - (2) Eighteen (18) polystyrene expansion molding machines, identified as #2C through #2T, exhausting through roof vents #2-C through #2-N.

## Unpermitted Emission Units and Pollution Control Equipment

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

## New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

There are no new emission units or pollution control equipment being added during this review process.

### **Insignificant Activities**

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (1) Six (6) natural gas-fired combustion units with a total rate of 0.76 million Btu per hour.
- (b) Closed loop heating and cooling systems.
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

### **Existing Approvals**

- (a) Administrative Amendment AAF 043 -19958-00014, issued on October 19, 2004
- (b) FESOP First Renewal Permit, F043-15305- 00014, issued on May, 24, 2002.

All conditions from previous approvals were incorporated into this FESOP.

A VOC test requirement for the polystyrene expansion process is added in this FESOP to ensure that the source complies with the FESOP requirement.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Recommendation**

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

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

An administratively complete FESOP Renewal application for the purposes of this review was received on July 31, 2006.

### **Emission Calculations**

See *Appendix A* of this document for detailed emissions calculations (pages 1 through 8).

**Unrestricted Potential Emissions**

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

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	1.3
PM-10	1.3
SO <sub>2</sub>	28.0
VOC	165.2
CO	4.7
NO <sub>x</sub>	8.2

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAPs	Unrestricted Potential Emissions (tons/yr)
<b>TOTAL</b>	Negligible

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOCs are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their VOC emissions to less than Title V levels; therefore, the source will be issued a FESOP.

**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 Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP (F043-7364-00014; issued on July 21, 1997).

Process/emission unit	Potential to Emit After Issuance (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Boiler (#1)	1.30	1.30	27.59	0.30	4.64	7.88	Negligible
Polystyrene Expansion Operation (#2)	--	--	--	Less than 98.3	--	--	Negligible
Insignificant Combustion Units	0.03	0.03	Negligible	0.02	0.28	0.33	Negligible
<b>Total PTE After Issuance</b>	<b>1.3</b>	<b>1.3</b>	<b>27.6</b>	<b>Less than 99</b>	<b>4.9</b>	<b>8.2</b>	<b>Negligible</b>

## County Attainment Status

The source is located in Floyd County.

Pollutant	Status
PM-2.5	Basic nonattainment
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
8-hour Ozone	Basic nonattainment
CO	Attainment
Lead	Attainment

- (a) U.S. EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Floyd County as nonattainment for PM<sub>2.5</sub>. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOCs) and nitrogen oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore the VOC emissions and the NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone standards. Floyd County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.
- (c) Floyd County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire 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 or 326 IAC 2-3 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 or Emission Offset applicability.

## Federal Rule Applicability

- (a) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c-48c, Subpart Dc), because the 12.6 MMBtu/hr boiler was constructed before June 9, 1989. Therefore, these requirements are not included in the permit.
- (b) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.560-566, Subpart DDD), because this standard only applies to the

manufacturing of polystyrene. This source only uses polystyrene to produce plastic products, instead of producing polystyrene. Therefore, these requirements are not included in the permit.

- (c) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.610-618, Subpart III), because this source does not manufacture any synthetic organic chemicals listed in 40 CFR 60.617. Therefore, these requirements are not included in the permit.
- (d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart U, because this source does not have any elastomer product process units (EPPU) or associated equipment. Therefore, these requirements are not included in the permit.
- (e) The requirements of 40 CFR part 64, Compliance Assurance Monitoring, are not included in this permit. These requirements apply to a Part 70 source that involves a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, which meets the following criteria:
  - (1) The unit is subject to an emission limitation or standard for an applicable regulated air pollutant;
  - (2) The unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard; and
  - (3) The unit has a potential to emit before controls equal to or greater than the applicable Part 70 major source threshold for the regulated pollutant.

As a FESOP source, this source has accepted federally enforceable limits such that the requirements of 326 IAC 2-7 (Part 70) do not apply. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source and not included in the permit.

### **State Rule Applicability - Entire Source**

#### **326 IAC 2-1.1-5 (Non-attainment NSR)**

Floyd County has been designated as non-attainment for PM 2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM2.5 Non-attainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM 2.5 major NSR regulations, states should assume that a major stationary source's PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 non-attainment major NSR program as a surrogate to address the requirements of non-attainment major NSR for the PM2.5 NAAQS. A major source in a non-attainment area is a source that emits or has the potential to emit 100 tons per year (tpy), of any regulated pollutant. Foam Fabricators, Inc. has a limited potential to emit of PM10 below 100 tpy. Therefore, assuming that PM10 emissions represent PM2.5 emissions, Non-attainment NSR does not apply.

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

The source is not 1 of 28 source categories as defined in 326 IAC 2-2-1(p)(1) and has the potential to emit of any regulated pollutant less than two hundred fifty (250) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 do not apply.

#### **326 IAC 2-3 (Emission Offset)**

Floyd County was declared nonattainment for 8-hour Ozone on June 15, 2004. Volatile Organic Compounds (VOCs) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for Ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the Ozone standards. Since the source has limited the potential to emit VOCs below one hundred (100) tons per year, and has minimal NO<sub>x</sub> emissions, the source is minor under 326

IAC 2-3 (Emission Offset). The facility has not conducted any modifications since these nonattainment classifications were established.

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

The source was constructed prior to July 27, 1997 and the potential HAP emissions from the entire source are less than the major source thresholds. Therefore, the requirements of 326 IAC 2-4.1 do not apply.

326 IAC 2-6 (Emission Reporting)

This source is exempt from the requirements of 326 IAC 2-6 (Emission Reporting), due to revisions made to the rule on March 27, 2004. This source is not located in one of the specified counties, does not emit lead, and is not subject to 326 IAC 2-7 (Part 70 Permit Program).

326 IAC 2-7 (Part 70 Permit Program)

This source is required to have a Part 70 permit, as described in 326 IAC 2-7-2(a). However, this source has accepted federally enforceable limits such that the requirements of 326 IAC 2-7 (Part 70) do not apply. As a FESOP, unless otherwise specified in this permit, the source is subject to all applicable requirements of 326 IAC 2-8.

326 IAC 2-8 (Federally Enforceable State Operating Permit Program, FESOP)

Pursuant to 326 IAC 2-8-4, the VOC input to the polystyrene expansion process will be limited to less than 140.4 tons per twelve (12) consecutive month period and the VOC emissions from this process will be limited to less than 0.7 ton per ton VOC input. These conditions will limit the VOC emissions from the polystyrene expansion process to  $140.4 \text{ tons/yr} \times 0.7 = 98.3 \text{ tons per year}$ . In addition, VOC emissions from the boilers and the insignificant sources are less than 0.5 tons per year. Therefore, the VOC emissions from the entire source is less than 100 tons per year and the requirements of 326 IAC 2-7 do not apply.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) at any one (1) to 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 no overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4, the source shall not generate fugitive dust to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

326 IAC 10-1 (Nitrogen Oxides Control in Clark and Floyd Counties)

This source does not have the potential to emit greater than or equal to one hundred (100) tons per year or more of NO<sub>x</sub> from all facilities. Therefore, the requirements of 326 IAC 10-1 do not apply.

### State Rule Applicability - Individual Facilities

#### 326 IAC 6-2-3 (PM Emissions for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-3(a), boilers existing and in operation before September 12, 1983, shall be limited by the following equation or by 0.6 lbs per MMBtu, whichever is more stringent:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where

C = max ground level concentration (= 50  $\mu\text{m}^3$ )

Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (MMBtu/hr)

N = number of stacks

a = plume rise factor (= 0.67)

H = stack height (ft) = 33 ft

The emission rate limit established from the equation above equals:

$$Pt = \frac{50 \times 0.67 \times 33}{76.5 \times 12.6^{0.75} \times 1^{0.25}} = 2.16 \text{ lbs/MMBtu}$$

Therefore, the most stringent PM emission limit for this boiler is 0.6 lbs/MMBtu.

The source is able to comply with the 0.6 lbs/MMBtu limit, as shown below:

Boiler #1, Natural gas:            0.42 tons/yr X 2000 lbs/ton = 840 lbs/yr,  
                                                 840 lbs/yr X 1yr/8760 hrs = 0.96 lbs/hr,  
                                                 0.96 lbs/hr X 1 hr/12.6 MMBtu = 0.008 lbs/MMBtu  
                                                 0.008 lbs/MMBtu < 0.6 lbs/MMBtu

Boiler #1, No. 2 Fuel Oil:        1.3 tons/yr X 2000 lbs/ton = 2600 lbs/yr,  
                                                 2600 lbs/yr X 1yr/8760 hrs = 0.297 lbs/hr,  
                                                 0.297 lbs/hr X 1 hr/12.6 MMBtu = 0.024 lbs/MMBtu  
                                                 0.024 lbs/MMBtu < 0.6 lbs/MMBtu

#### 326 IAC 7-1.1-2 (SO<sub>2</sub> Emission Limitations)

The potential emissions of SO<sub>2</sub> from the boiler are greater than 25 tons per year. Pursuant to 326 IAC 7-1.1-2, sulfur dioxide emissions from this boiler shall be limited to 0.5 pounds per million Btu heat input, when burning No. 2 fuel oil.

PTE after Issuance = 0.5 lbs/1MMBtu X 12.6 MMBtu/1hr X 8760 hrs/1 yr X 1 ton/2000lbs = 27.594 tons/year.

### State Rule Applicability - Polystyrene Expansion Process (#2)

#### 326 IAC 2-8-4(9) (Preventive Maintenance Plan)

The Permittee has indicated that air emission would not increase in the event of non-maintenance and/or malfunction of the polystyrene expansion process. In addition, the process would be simply shut down in the event of malfunction. Therefore, Foam Fabricator, Inc. has requested the condition of Preventive Maintenance Plan to be removed from the prior FESOP (F043-7264-00014). This change has been made in Administrative Amendment (AAF 043-10431-00014), issued on January 6, 1999. Therefore, no Preventive Maintenance Plan of the polystyrene expansion process is required in Section D of this renewal FESOP.

**326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies)**

326 IAC 6-3-2 does not apply to these pre-expansion units or molding machines, since the expansion process does not emit any PM.

**326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)**

This source was in operation before January 1, 1980, the applicability date of this rule; therefore, 326 IAC 8-1-6 does not apply to these facilities.

**326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)**

This source is located in Floyd County and its potential to emit of VOCs is less than 100 tons per year, after limitations taken by the source in order to be considered a FESOP. Therefore, the requirements of 326 IAC 8-7 do not apply to these facilities.

## **Testing Requirements**

Mass Balance testing is used to calculate the VOC emissions from these facilities in lieu of stack testing, as it has been deemed by IDEM to be a more effective and reliable estimation of actual emissions. If input materials change at any time, IDEM, OAQ must be notified, and these facilities will be subject to mass balance or stack testing and any other procedures necessary to ensure compliance with the FESOP requirements.

The VOC emissions are estimated based on the assumption of thirty percent (30%) pentane retention in the products during the polystyrene expansion process:

$$\text{VOC emissions} = 140.4 \text{ tons/yr VOC input} \times (1 - 30\% \text{ pentane retention}) = 98.3 \text{ tons/yr}$$

At least 30% of pentane retention is necessary to make the VOC emissions from the entire source less than 100 tons per year. Since the VOC from the polystyrene expansion process is greater than 40% of all criteria pollutants and the retention factor has not been validated by IDEM, OAQ, testing is required to ensure that the source complies with the FESOP requirements.

## **Compliance Requirements**

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also 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.

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

- (1) The 12.6 MMBtu/hr boiler has applicable compliance monitoring conditions as specified below:

Visible emissions notations of the boiler stack exhaust shall be performed once per day during normal daylight operations while the boiler is burning No.2 fuel oil. A trained employee will record whether emissions are normal or abnormal. 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. 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. 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary to ensure the boiler is operating properly and to ensure compliance with 326 IAC 6-2-3 (Particulate Emission Limitation for Sources of Indirect Heating) and 326 IAC 2-8 (FESOP).

- (2) Polystyrene expansion process, identified as #2, with a maximum throughput rate of 1,534 pounds of expandable polystyrene beads per hour. This process shall continually be evaluated using mass-balance testing to ensure VOC retention.

## **Conclusion**

The operation of this plastic foam products manufacturing plant shall be subject to the conditions of the attached proposed (FESOP No.: F043-23440-00014).

**Appendix A: Emission Calculations  
 Natural Gas Combustion  
 (MMBtu/hr < 100)  
 From 12.6 MMBtu/hr Boiler (#1)**

**Company Name: Foam Fabricators, Inc.  
 Address City IN Zip: 950 Progress Boulevard, New Albany, IN 47150  
 Permit Number: F043-23440-00014  
 Plt ID: 043-00014  
 Reviewer: Angela Taylor  
 Date: June 20, 2007**

**Heat Input Capacity**  
 MMBtu/hr

12.6

**Potential Throughput**  
 MMCF/yr

110.4

**Pollutant**

	<b>PM*</b>	<b>PM10*</b>	<b>SO2</b>	<b>**NO<sub>x</sub></b>	<b>VOC</b>	<b>CO</b>
<b>Emission Factor in lb/MMCF</b>	7.6	7.6	0.6	100	5.5	84.0
<b>Potential Emission in tons/yr</b>	0.42	0.42	3.3E-02	5.52	0.30	4.64

\*PM and PM10 emission factors are condensable and filterable PM10 combined.

\*\*Emission Factors for NO<sub>x</sub>: Uncontrolled = 100, Low NO<sub>x</sub> Burner = 50, Low NO<sub>x</sub> Burners/Flue gas recirculation = 32

**Methodology**

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler  
 HAPs Emissions**

**Company Name:** Foam Fabricators, Inc.  
**Address City IN Zip:** 950 Progress Boulevard, New Albany, IN 47150  
**Permit Number** 043-23440-00014  
**Plt ID:** 043-00014  
**Reviewer:** Angela Taylor  
**Date:** June 20, 2007

**HAPs - Organics**

	<b>Benzene</b>	<b>Dichlorobenzene</b>	<b>Formaldehyde</b>	<b>Hexane</b>	<b>Toluene</b>
<b>Emission Factor in lb/MMcf</b>	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
<b>Potential Emission in tons/yr</b>	1.323E-05	7.560E-06	4.725E-04	1.134E-02	2.142E-05

**HAPs - Metals**

	<b>Lead</b>	<b>Cadmium</b>	<b>Chromium</b>	<b>Manganese</b>	<b>Nickel</b>
<b>Emission Factor in lb/MMcf</b>	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
<b>Potential Emission in tons/yr</b>	3.150E-06	6.930E-06	8.820E-06	2.394E-06	1.323E-05

**Methodology:**

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF - 1,000,000 Cubic Feet of Gas

The five highest organic and metal HAPs emission factors are provided above.

Emission Factors from AP-42, Chapter 1.4, Tables 1.4-3 and 1.4-4, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations  
Commercial/Institutional/Residential Combustors  
( < 100 MMBtu/hr) #2 Fuel Oil  
From 12.6 MMBtu/hr Boiler (#1)**

**Company Name: Foam Fabricators, Inc.  
Address City IN Zip: 950 Progress Boulevard, New Albany, IN 47150  
Permit Number: F043-23440-00014  
Plt ID: 043-00014  
Reviewer: Angela Taylor  
Date: June 20, 2007**

<b>Heat Input Capacity</b> MMBtu/hr	<b>Potential Throughput</b> kgals/year	<b>S = Weight % Sulfur</b>
12.6	788.4	0.5

Emission Factor in lb/kgal	Pollutant					
	PM*	PM10*	SO2	NO <sub>x</sub>	VOC	CO
	3.3	3.3	71 (142.0 S)	20.0	0.34	5.0
<b>Potential Emission in tons/yr</b>	1.30	1.30	27.99	7.88	0.13	1.97

\*PM and PM10 emission factors are condensable and filterable PM10 combined.

**Methodology**

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 kgal/1,000 gal x 1 gal/0.140 MMBtu

Emission Factors are from AP-42, Tables 1.3-1, 1.3-2, and 1.3-3 ( SCC 1-03-005-01/02/03) Supplement E 9/98 (see errata file)

Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal)/2,000 lb/ton

**Appendix A: Emission Calculations  
Industrial Boilers (> 100 mmBtu/hr)  
#1 and #2 Fuel Oil  
HAPs Emissions**

**Company Name: Foam Fabricators, Inc.  
Address City IN Zip: 950 Progress Boulevard, New Albany, IN 47150  
Permit Number: F043-23440-00014  
Plt ID: 043-00014  
Reviewer: Angela Taylor  
Date: June 20, 2007**

<b>Heat Input Capacity</b> MMBtu/hr	<b>Potential Throughput</b> kgals/year	<b>S = Weight % Sulfur</b> 0.5
12.6	788.4	

HAPs - Metals

Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	1.38E-02	1.04E-02	1.04E-02	1.04E-02	3.11E-02

HAPs - Metals (continued)

Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential Emission in tons/yr	1.04E-02	2.07E-02	1.04E-02	5.18E-02

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)\*Emission Factor (lb/mmBtu)\*8,760 hrs/yr / 2,000 lb/ton

**Appendix A: Emission Calculations**

**VOC Emissions**

**From Polystyrene Expansion Process (#2)**

**Company Name: Foam Fabricators, Inc.**

**Address City IN Zip: 950 Progress Boulevard, New Albany, IN 47150**

**Permit Number: F043-23440-00014**

**Pit ID: 043-00014**

**Reviewer: Angela Taylor**

**Date: June 20, 2007**

**I. Facility Description:**

The Polystyrene Expansion Process (#2) includes the following:

- (1) Two (2) pre-expanders, identified as #2A and #2B
- (2) Eighteen (18) polystyrene expansion molding machines, identified as #2C - #2T

Maximum throughput rate:	1533.6 lbs/hr
Averaged pentane (VOC) content:	0.035 lbs pentane/lb beads
Pentane Retention Efficiency:	30 %

**II. Potential VOC Emissions:**

$$1533.6 \text{ (lbs beads/hr)} \times 0.035 \text{ (lbs pentane/lb beads)} \times (1-30\%) \times 8760 \text{ (hr/yr)} \times 1 \text{ (ton/2000 lbs)} = \quad \mathbf{164.57 \text{ tons/yr}}$$

**III. Potential VOC Emissions After Controls:**

$$140.4 \text{ tons VOC input/yr} \times 0.7 \text{ tons VOC Emissions/ ton VOC Input} = \quad \mathbf{98.3 \text{ tons VOC Emissions/yr}}$$

Limit VOC Input:	140.4 tons VOC input/yr
Limit VOC Emissions:	0.7 tons VOC Emissions/ ton VOC Input

**Appendix A: Emission Calculations  
Natural Gas Combustion  
(MMBtu/hr < 100)  
From Insignificant Combustion Units**

**Company Name: Foam Fabricators, Inc.  
Address City IN Zip: 950 Progress Boulevard, New Albany, IN 47150  
Permit Number: F043-23440-00014  
Plt ID: 043-00014  
Reviewer: Angela Taylor  
Date: June 20, 2007**

**Heat Input Capacity**  
MMBtu/hr

0.76

**Potential Throughput**  
MMCF/yr

6.7

**Pollutant**

	<b>PM*</b>	<b>PM10*</b>	<b>SO2</b>	<b>**NO<sub>x</sub></b>	<b>VOC</b>	<b>CO</b>
<b>Emission Factor in lb/MMCF</b>	7.6	7.6	0.6	100	5.5	84.0
<b>Potential Emission in tons/yr</b>	<b>0.03</b>	<b>0.03</b>	<b>2.0E-03</b>	<b>0.33</b>	<b>0.02</b>	<b>0.28</b>

\*PM and PM10 emission factors are condensable and filterable PM10 combined.

\*\*Emission Factors for NO<sub>x</sub>: Uncontrolled = 100, Low NO<sub>x</sub> Burner = 50, Low NO<sub>x</sub> Burners/Flue gas recirculation = 32

**Methodology**

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emission Calculations  
Natural Gas Combustion  
(MMBtu/hr < 100)  
From Insignificant Combustion Units**

**Company Name: Foam Fabricators, Inc.  
Address City IN Zip: 950 Progress Boulevard, New Albany, IN 47150  
Permit Number: F043-23440-00014  
Plt ID: 043-00014  
Reviewer: Angela Taylor  
Date: June 20, 2007**

**Input Capacity**  
MMBtu/hr

**Potential Throughput**  
MMCF/yr

0.76

6.7

**HAPs - Organics**

	<b>Benzene</b>	<b>Dichlorobenzene</b>	<b>Formaldehyde</b>	<b>Hexane</b>	<b>Toluene</b>
<b>Emission Factor in lb/MMcf</b>	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
<b>Potential Emission in tons/yr</b>	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00

**HAPs - Metals**

	<b>Lead</b>	<b>Cadmium</b>	<b>Chromium</b>	<b>Manganese</b>	<b>Nickel</b>
<b>Emission Factor in lb/MMcf</b>	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
<b>Potential Emission in tons/yr</b>	0.000E+00	0.000E+00	0.000E+00	0.000E+00	0.000E+00

**Methodology** = the same as page 6.

The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations**  
**Emissions Summary**  
**Company Name: Foam Fabricators, Inc.**  
**Address City IN Zip: 950 Progress Boulevard, New Albany, IN 47150**  
**Permit Number: F043-23440-00014**  
**Plt ID: 043-00014**  
**Reviewer: Angela Taylor**  
**Date: June 20, 2007**

<b>Uncontrolled Emissions in tons/year</b>							
	<b>PM</b>	<b>PM-10</b>	<b>SO2</b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>HAPs</b>
<b>Boiler #1, Natural Gas</b>	0.42	0.42	0.033	5.52	0.3	4.64	negligible
<b>Boiler #1, No. 2 Fuel oil</b>	1.3	1.3	27.99	7.8	0.13	1.97	negligible
<b>Poly. Expansion</b>	-----	-----	-----	-----	164.57	-----	-----
<b>Heaters (Insignificant Comb.)</b>	0.03	0.03	0.002	0.33	0.02	0.28	negligible
<b>Total (with Nat. Gas) =</b>	0.45	0.45	0.035	5.85	164.89	4.92	0
<b>Total (with No. 2 Fuel oil) =</b>	1.33	1.33	27.992	8.13	164.72	2.25	0

<b>Controlled Emissions in tons/year</b>							
	<b>PM</b>	<b>PM-10</b>	<b>SO2</b>	<b>Nox</b>	<b>VOC</b>	<b>CO</b>	<b>HAPs</b>
<b>Boiler #1, Natural Gas</b>	0.42	0.42	0.033	5.52	0.3	4.64	negligible
<b>Boiler #1, No. 2 Fuel oil</b>	1.3	1.3	27.99	7.8	0.13	1.97	negligible
<b>Poly. Expansion</b>	-----	-----	-----	-----	98.3	-----	-----
<b>Heaters (Insignificant Comb.)</b>	0.03	0.03	0.002	0.33	0.02	0.28	negligible
<b>Total (with Nat. Gas) =</b>	0.45	0.45	0.035	5.85	98.62	4.92	0
<b>Total (with No. 2 Fuel oil) =</b>	1.33	1.33	27.992	8.13	98.45	2.25	0