



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: September 15, 2006
RE: UGN, Incorporated / 127-23483-00072
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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
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Mr. Ken DeRolf
UGN, Inc.
18410 Crossing Drive, Suite C
Tinley Park, Illinois 60477

September 15, 2006

Re: 127-23483-00072
Second Notice-Only Change to
MSOP 127-16516-00072

Dear Mr. DeRolf:

UGN, Inc. was issued a Minor Source Operating Permit on April 22, 2003 for a stationary automotive polyurethane foam composite part/plastic headliner manufacturing plant. A letter notifying the OAQ of the addition of two (2) new Ultralite (UL) cells (#3 and #4) was received on August 8, 2006. The changes requested include:

- (a) Install and operate two (2) Ultralite cells (identified as UL-3 and UL-4), each with a maximum processing capacity of 840 pounds of padding per hour. The new Ultralite cells are of the same type and capacity as the existing units UL-1 and UL-2 already permitted.
- (b) Revise the processing capacity of each of the two (2) existing Ultralite cells (identified as UL-1 and UL-2) from 936 pounds per hour to 840 pounds of padding per hour.
- (c) Re-estimate the potential to emit (PTE) for the existing Ultralite cells. On December 14 and 15, 2005, the Permittee conducted a stack test on one of the two existing Ultralite cells (UL-2), as required by existing Condition D.1.6 in MSOP No.: 127-16516-00072, issued April 22, 2003. The test results were submitted to the Compliance Determination Section of IDEM, OAQ on January 25, 2006. UGN, Inc. requested the potential to emit of criteria pollutants be revised based on the stack test results.
- (d) Include the potential to emit of PM and PM10 from two (2) existing spray booths (identified as PVC-1 and PVC-2) equal to 21.2 tons per year, prior to dry filters, in the source-wide PTE calculations. These booths were added to the MSOP via First Notice Only Change No.: 127-18606-00072, issued March 30, 2004, because the spray booths (identified as PVC-1 and PVC-2) were subject to the provisions of 326 IAC 6-3-2(d) and would comply with the same applicable requirements as the existing headliner spray booth line (identified as HL-1). The PM and PM10 emissions were not previously included in the total source-wide emissions and do not trigger new applicable requirements for the source.
- (e) Condition C.11 (Emission Statement) should be deleted because the requirements of 326 IAC 2-6 do not apply to this source.
- (f) Condition D.1.6 should be revised (f) to indicate that the required stack testing was completed on December 14, and 15, 2005.

Emission Estimation Summary

- (a) IDEM, OAQ was unable to revise the potential emissions using the new stack testing results, because as of September 2006, the stack test results have not yet been validated by IDEM's Compliance Determination Section. Additional information is required for the laboratory that conducted the analysis of samples before validation can be completed. However, the potential emission of PM/PM10 and VOC for UL-1 and UL-2 have been revised using the revised maximum capacity of 840 lbs/hour (see page 3 of Appendix A). Condition D.1.6 cannot be revised as requested by UGN, Inc. until the stack test results have been validated by IDEM.
- (b) Based on information provided by UGN, Inc., the robotic hot melt adhesive application will use a non-VOC based adhesive and will not emit any regulated criteria pollutants or hazardous air pollutants (HAPs).
- (c) Based on information provided by UGN, Inc., the mold/bond press and the trim presses will not emit any regulated criteria pollutants or hazardous air pollutants (HAPs).
- (d) Heating of padding in curing ovens: The padding (AFR and LOFT) that is processed at this source is pre-manufactured by Hobbs Manufacturing and contains polyester fibers that are coated with latex and may contain pigments and fire retardant compounds. The polyester fibers are formed into a pad and cured in an oven at Hobbs Manufacturing before being sent to UGN, Inc. The curing ovens will indirectly heat the fibers, with no direct contact of the padding with the oven. The oven helps to firm up the padding by partially melting the polyester fibers.

Rule Applicability

The new Ultralite cells (identified as UL-3 and UL-4) are subject to the requirements of 326 IAC 6-3-2 and shall comply with the same applicable requirements as the existing Ultralite cells (identified as UL-1 and UL-2), which were permitted via MPR to MSOP No.: 127-21099-00072, issued May 11, 2005. The new Ultralite cells (identified as UL-3 and UL-4) will not trigger new applicable requirements, and will be added to the MSOP as a notice-only change, pursuant to 326 IAC 2-6.1-6(d)(13).

With the additional two (2) Ultralite cells (identified as UL-3 and UL-4), the potential to emit of each criteria pollutant from the entire source is still less than the Part 70 major source thresholds (100 tons per year for all criteria pollutants). See Appendix A for emission calculations. When the original MSOP was issued on May 11, 2005, Porter County was designated as severe non-attainment for the 1-hour ozone standard. On August 7, 2006, a temporary emergency rule took effect revoking the 1-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate this change into 326 IAC 1-4-1. The permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule. Condition A.1 has been revised to reflect the revocation of the 1-hour ozone standard. Pursuant to the provisions of 326 IAC 2-6.1, Sections A.2 and D.1 have been revised as follows to reflect these new emission units. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

IDEM, OAQ has reviewed 326 IAC 2-6 (Emission Reporting) and agrees that this source is not subject to the requirements of this rule because it is not required to operate under a Part 70 permit; is located in Porter County but has a potential to emit VOC that is less than twenty-five (25) tons per year; and does not have the potential to emit lead into the ambient air at levels of five (5) tons per year. Condition C.11 has been deleted from the permit.

IDEM, OAQ has also deleted the references to 326 IAC 2-7-5(15). This reference is not applicable to Minor Source Operating Permits (MSOPs). The correct rule citation, 326 IAC 2-6.1-5(a)(1) has been added.

Proposed Changes

Pursuant to the provision of 326 IAC 2-6.1, the permit is hereby amended as follows:

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates stationary automotive polyurethane foam composite part/plastic headliner manufacturing plant.

Authorized Individual:	Environmental Coordinator
Source Address:	2252 Industrial Drive, Valparaiso, Indiana 46383
Mailing Address:	1001 State Street, Chicago Heights, Illinois 60411
General Source Phone:	708-757-8608
SIC Code:	3714
County Location:	Porter
Source Location Status:	Severe nonattainment area for ozone based on the 1-hour standard Nonattainment area for ozone based on the 8-hour standard Nonattainment area for PM2.5 Attainment area for all other criteria pollutants
Source Status:	Minor Source, under PSD and Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Listed Source Categories

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

....

- (p) One (1) Ultralite Cell, identified as UL-1, to be constructed in 2005, with a maximum throughput rate of ~~936~~ **840** pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-1-B and C-1-D, respectively, and to hood systems C-1-A and C-1-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.
- (q) One (1) Ultralite Cell, identified as UL-2, to be constructed in 2005, with a maximum throughput rate of ~~936~~ **840** pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-2-B and C-2-D, respectively, and to hood systems C-2-A and C-2-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.
- (r) **One (1) Ultralite Cell, identified as UL-3, to be constructed in 2006, with a maximum throughput rate of 840 pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-3-B and C-3-D, respectively, and to hood systems C-3-A and C-3-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.**
- (s) **One (1) Ultralite Cell, identified as UL-4, to be constructed in 2006, with a maximum throughput rate of 840 pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-4-B and C-4-D, respectively, and to hood systems C-4-A and C-4-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.**

~~C.11 Emission Statement [326 IAC 2-6]~~

~~(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~

~~(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);~~

~~(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.~~

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:~~

~~Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2254~~

~~(c) The annual emission statement 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.~~

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

~~C.12C.11 General Record Keeping Requirements [326 IAC 2-6.1-5]~~

~~C.13C.12 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]~~

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description ~~[326 IAC 2-7-5(15)]: [326 IAC 2-6.1-5(a)(1)]~~

....

(p) One (1) Ultralite Cell, identified as UL-1, to be constructed in 2005, with a maximum throughput rate of ~~936~~ **840** pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-1-B and C-1-D, respectively, and to hood systems C-1-A and C-1-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.

(q) One (1) Ultralite Cell, identified as UL-2, to be constructed in 2005, with a maximum throughput rate of ~~936~~ **840** pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-2-B and C-2-D, respectively, and to hood systems C-2-A and C-2-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.

(r) **One (1) Ultralite Cell, identified as UL-3, to be constructed in 2006, with a maximum throughput rate of 840 pounds of padding per hour, equipped with two (2) natural gas-**

fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-3-B and C-3-D, respectively, and to hood systems C-3-A and C-3-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.

- (s) One (1) Ultralite Cell, identified as UL-4, to be constructed in 2006, with a maximum throughput rate of 840 pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-4-B and C-4-D, respectively, and to hood systems C-4-A and C-4-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.

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

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

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

....

Particulate emissions from each of the ~~two (2)~~ **four (4)** Ultralite Cells (UL-1 ~~and through UL-2 4~~) shall not exceed ~~2.47~~ **2.29** pounds per hour when operating at a process weight rate of ~~936~~ **840** pounds per hour.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [~~326 IAC 2-7-5(15)~~]: **[326 IAC 2-6.1-5(a)(1)]**:

- (i) Eleven (11) roof air-makeup units burning natural gas, with a combined heat input capacity of 26.90 MMBtu/hr. These units were installed in 1997.
- (j) Fifteen (15) various natural gas-fired heaters, with a combined heat input capacity of 3.64 MMBtu/hr. These units were installed in 1996.

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

Emission Limitations and Standards

There are no specific State and Federal rules applicable to these emission units.

...

IDEM, OAQ has also updated the contact information as follows:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, ~~P. O. Box 6015~~
Indianapolis, IN ~~46206-6015~~ **46204-2251**

FAX NUMBER: 317 233-~~5967~~ **6865**

All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Ms. Sanober Durrani, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, or call (800) 451-6027, ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

ERG/SD

Attachments:

cc: File – Porter County
Porter County Health Department
Air Compliance – Michael Hall and Ramesh Tejuja
Northwest Regional Office
Permit Tracking
Compliance Data Section
Administrative and Development
Technical Support and Modeling – Michele Boner



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Indianapolis, Indiana 46204-2251
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NEW SOURCE CONSTRUCTION PERMIT AND MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

UGN, Inc.
2252 Industrial Drive
Valparaiso, Indiana 46383

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 127-16516-00072	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 22, 2003 Expiration Date: April 22, 2008

First Notice Only Change No.: 127-18606-00072, issued March 30, 2004
First Minor Permit Revision No.: 127-20418-00072, issued January 11, 2005
Second Minor Permit Revision No.: 127-21099-00072, issued on May 11, 2005

Second Notice Only Change No.: 127-23483-00072	Pages Affected: 18, 29, 31
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: September 15, 2006 Expiration Date: April 22, 2008

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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 and A.2 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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates stationary automotive polyurethane foam composite part/plastic headliner manufacturing plant.

Authorized Individual:	Environmental Coordinator
Source Address:	2252 Industrial Drive, Valparaiso, Indiana 46383
Mailing Address:	1001 State Street, Chicago Heights, Illinois 60411
General Source Phone:	708-757-8608
SIC Code:	3714
County Location:	Porter
Source Location Status:	Nonattainment area for ozone based on the 8-hour standard Nonattainment area for PM2.5
Source Status:	Attainment area for all other criteria pollutants Minor Source, under PSD and Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Listed Source Categories

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) Seven (7) molding cells (identified as Cell # 1 through 7), consisting of forty-four (44) injection mold carriers, with a total production of 12,481 pounds of molded polyurethane foam insulation per hour. The stacks on Cell #3 have an exhaust rate of 8,500 acfm each. All other stacks have a flow rate of 5,000 acfm. This facility was constructed in 1996.
- (b) One (1) headliner adhesive spray line booth (identified as HL-1), using two (2) airless spray guns, capable of spraying both sides of 60 headliners per hour. This facility was constructed in 1997.
- (c) One (1) laminator press, which has a capability to handle 1.46 x 2.87 square meters for the largest part. This unit was constructed in 1997.
- (d) Three (3) water jet cutters, with a combined capacity of 60 headliners per hour. These units were constructed in 1997.
- (e) Two (2) 11,000 gallon bulk organic chemical storage tanks. These units were constructed in 1997.
- (f) Two (2) 6,000 gallon bulk organic chemical storage tanks. These units were constructed in 1997.
- (g) One (1) cold cleaner tank with a storage capacity of 20 gallons and maximum solvent consumption of one (1) gallon per day, used for degreasing operation and located in the maintenance department. This unit was installed in January, 1997.

- (h) Plant wide use of cleanup solvents and mold release agents delivered from either aerosol cans, manual spray bottles, or air atomization spray guns and use of adhesive, which is brushed on or applied with aerosol spray cans. Also, the use of solvent pumped from one closed container to another to flush adhesive delivery lines.
- (i) Eleven (11) roof air-makeup units burning natural gas, with a combined heat input capacity of 26.90 MMBtu/hr. These units were installed in 1997.
- (j) Fifteen (15) various natural gas-fired heaters, with a combined heat input capacity of 3.64 MMBtu/hr. These units were installed in 1996.
- (k) One (1) mudguard operation (identified as cell #9) using polyester terephthalate (PET) and latex padding with a maximum process rate of 360 pounds per hour. This facility will be constructed in 2003.
- (l) Two (2) cold tank cleaners with a combined storage capacity of 115 gallons and maximum solvent consumption of one (1) gallon per day, used for degreasing operations. These units will be constructed in 2003.
- (m) Two (2) adhesive spray booths, identified as PVC-1 and PVC-2, constructed in 2004, each with a maximum throughput rate of 100 fibrous pads per hour, using airless spray guns, and controlled by dry filters.
- (n) One (1) clean-up operation for tool and equipment, constructed in 2004, using aerosol spray cans.
- (o) Four (4) hot molding presses (identified as HMP-1,2,3, and 4) each with a maximum throughput rate of 236 pounds of padding and fabric per hour, and using a water-based mold release agent, sprayed intermittently onto the mold surface to prevent sticking. These units were constructed in 2004.
- (p) One (1) Ultralite Cell, identified as UL-1, to be constructed in 2005, with a maximum throughput rate of 840 pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-1-B and C-1-D, respectively, and to hood systems C-1-A and C-1-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.
- (q) One (1) Ultralite Cell, identified as UL-2, to be constructed in 2005, with a maximum throughput rate of 840 pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-2-B and C-2-D, respectively, and to hood systems C-2-A and C-2-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.
- (r) One (1) Ultralite Cell, identified as UL-3, to be constructed in 2006, with a maximum throughput rate of 840 pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-3-B and C-3-D, respectively, and to hood systems C-3-A and C-3-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.
- (s) One (1) Ultralite Cell, identified as UL-4, to be constructed in 2006, with a maximum throughput rate of 840 pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-4-B and C-4-D, respectively, and to hood systems C-4-A and C-4-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated there under, as well as other applicable local, state, and federal requirements.

B.2 Definitions

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 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit 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 of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.6 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled ~~a~~Minor Source Operating Permit~~@~~, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.7 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6, 326 IAC 2-2 and 326 IAC 2-3 and an Operation Permit Validation Letter is issued.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New

Source Performance Standards (NSPS) shall be applicable to each individual phase.

- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

B.8 NSPS Reporting Requirement

Pursuant to the New Source Performance Standards (NSPS), Part 60.110Kb, Subpart Kb, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- (a) Commencement of construction date (no later than 30 days after such date);
- (b) Actual start-up date (within 15 days after such date); and
- (c) Date of performance testing (at least 30 days prior to such date), when required by a condition elsewhere in this permit.

Reports are to be sent to:

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

The application and enforcement of these standards have been delegated to the IDEM, OAQ. The requirements of 40 CFR Part 60 are also federally enforceable.

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

- (d) The notification 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.

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:

- (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.

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

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

The PMP extension notification does not require the certification by an Authorized individual@ as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMP=s 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 PMP whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by an Authorized individual@ as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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 makes a reasonable time.

B.11 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by an Authorized individual@ as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.12 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2]

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 permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.13 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the authorized individual@ as defined by 326 IAC 2-1.1-1.

B.14 Annual Fee Payment [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.
- (b) 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.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate 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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

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 no overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an authorized individual as defined by 326 IAC 2-7-1(34).

- (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) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements

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

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (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 the IDEM, OAQ, if the source 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.7 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements

C.8 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.9 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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

Record Keeping and Reporting Requirements

C.10 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.11 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. 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 when operation begins.

C.12 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an authorized individual as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1-5(a)(1)]:

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

- (p) One (1) Ultralite Cell, identified as UL-1, to be constructed in 2005, with a maximum throughput rate of 840 pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-1-B and C-1-D, respectively, and to hood systems C-1-A and C-1-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.
- (q) One (1) Ultralite Cell, identified as UL-2, to be constructed in 2005, with a maximum throughput rate of 840 pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-2-B and C-2-D, respectively, and to hood systems C-2-A and C-2-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.
- (r) One (1) Ultralite Cell, identified as UL-3, to be constructed in 2006, with a maximum throughput rate of 840 pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-3-B and C-3-D, respectively, and to hood systems C-3-A and C-3-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.
- (s) One (1) Ultralite Cell, identified as UL-4, to be constructed in 2006, with a maximum throughput rate of 840 pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-4-B and C-4-D, respectively, and to hood systems C-4-A and C-4-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.

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

Emission Limitations and Standards

D.1.1 Emission Offset [326 IAC 2-3]

This source is not subject to the requirements of 326 IAC 2-3 (Emission Offset) because the potential to emit VOC from the entire source is less than twenty-five (25) tons per year. Any change or modification which would increase the potential emissions to equal to or greater than twenty-five (25) tons per year of VOC must receive prior approval from IDEM, OAQ.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

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

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1,

1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

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

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

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

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

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

Particulate emissions from each of the four (4) Ultralite Cells (UL-1 through UL-4) shall not exceed 2.29 pounds per hour when operating at a process weight rate of 840 pounds per hour.

The pounds per hour limitations were calculated using the following equation:

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

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

D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and control devices.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-1.1-11]

Within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up of a representative Ultralite Cell (UL-1 or UL-2), the Permittee shall perform a one time stack test to measure PM, PM10, VOCs, and HAPs emitted from the heating of padding material in the curing ovens using methods as approved by the Commissioner, in order to determine alternative emission factors for PM, PM10, VOCs, and HAPs. PM10 includes filterable and condensable PM10. The testing shall be performed on one representative Ultralite Cell (UL-1 or UL-2) only if the other Ultralite Cell has identical specifications, will be operated under similar conditions, and will process similar materials. If the Ultralite Cell is not identical in above aspects to the representative Ultralite Cell, it will have to be tested individually. Testing shall be conducted in accordance with Section C - Performance Testing. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the headlines spray booth stacks (HL-1 and HL-2) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-9-1]

Pursuant to 326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels), the source owner and operator shall maintain a record and submit to the department a report containing the following information for the two (2) six thousand (6,000) gallon storage tanks:

- (1) The vessel identification;
- (2) The vessel dimensions; and
- (3) The vessel capacity.

D.1.9 Volatile Organic Compound Storage Vessels [40 CFR 60, Subpart Kb]

Pursuant to 40 CFR 60, Subpart Kb (326 IAC 12), the Permittee shall maintain records of the dimensions and an analysis showing the capacity of the two (2) 11,000 gallon storage tanks. These records shall be maintained for the life of the source.

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The cleanup and degreasing solvent usage for each month;
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1-5(a)(1)]:

- (i) Eleven (11) roof air-makeup units burning natural gas, with a combined heat input capacity of 26.90 MMBtu/hr. These units were installed in 1997.
- (j) Fifteen (15) various natural gas-fired heaters, with a combined heat input capacity of 3.64 MMBtu/hr. These units were installed in 1996.

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

Emission Limitations and Standards

There are no specific State and Federal rules applicable to these emission units.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	UGN, Inc.
Address:	2252 Industrial Drive
City:	Valparaiso, IN 46383
Phone #:	708-757-8608
MSOP #:	127-16516-00072

I hereby certify that UGN, Inc. is still in operation.
 no longer in operation.

I hereby certify that UGN, Inc. is in compliance with the requirements of MSOP 127-16516-00072.
 not in compliance with the requirements of MSOP 127-16516-00072.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-6865**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF >MALFUNCTION= AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 Malfunction definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**Appendix A: Emission Calculations
Emissions from Natural Gas Combustion
Four (4) New Cure Ovens**

Company Name: UGN, Inc.
Address: 2252 Industrial Drive, Valparaiso, Indiana 46383
NOC to MSOP: 127-23483
Plant ID: 127-00072
Reviewer: ERG/SD
Date: September 5, 2006

Heat Input Capacity
(MMBtu/hour)

Potential Throughput
(MMSCF/year)

9.60 (Four Units Total)

82.4

Emission Factor (lb/MMSCF)	* PM 1.9	* PM10 7.6	SO₂ 0.6	** NO_x 100	VOC 5.5	CO 84
Potential To Emit (tons/year)	0.08	0.31	0.02	4.12	0.23	3.46

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

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

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

All emission factors are based on normal firing.

METHODOLOGY

Potential Throughput (MMSCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMSCF/1020 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMSCF/year) * Emission Factor (lb/MMSCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations
Emissions from Natural Gas Combustion
Four (4) New Cure Ovens**

Company Name: UGN, Inc.

Address: 2252 Industrial Drive, Valparaiso, Indiana 46383

NOC to MSOP: 127-23483

Plant ID: 127-00072

Reviewer: ERG/SD

Date: September 5, 2006

HAPs - Organics

Emission Factor (lb/MMSCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	8.66E-05	4.95E-05	3.09E-03	7.42E-02	1.40E-04

HAPs - Metals

Emission Factor (lb/MMSCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential To Emit (tons/year)	2.06E-05	4.53E-05	5.77E-05	1.57E-05	8.66E-05

Total HAP = 7.42E-02 tons/year

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1.4-3 and 1.4-4 (July, 1998).

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

**Appendix A: Emission Calculations
PM/PM10 and VOC Emissions
From Ultralite Cells**

Company Name: UGN, Inc.
Address: 2252 Industrial Drive, Valparaiso, Indiana 46383
NOC to MSOP: 127-23483
Plant ID: 127-00072
Reviewer: ERG/SD
Date: September 5, 2006

Emission/Process Units	Maximum Capacity (lbs/hour)	PM Emission Rate (lb/ton)	PM10 Emission Rate (lb/ton)	PTE of PM (tons/year)	PTE of PM10 (tons/year)	VOC Emission Rate (lb/ton)	PTE of VOC (tons/year)
UL-1	840	3.20	3.20	5.89	5.89	0.55	1.01
UL-2	840			5.89	5.89		1.01
UL-3	840			5.89	5.89		1.01
UL-4	840			5.89	5.89		1.01
Total=				23.5	23.5		4.05

Emission rates were obtained from a Minor Permit Revision 127-21099-00072, issued May 11, 2005.

METHODOLOGY

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

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

**Appendix A: Emissions Calculations
HAP Emissions for Ultralite Cells**

Company Name: UGN, Inc.
Address: 2252 Industrial Drive, Valparaiso, Indiana 46383
NOC to MSOP: 127-23483
Plant ID: 127-00072
Reviewer: ERG/SD
Date: September 5, 2006

Emission Parameters

Stack Pressure, P =	1.0 atm (assume)
Average Stack Temperature for Cell 7, T =	185.5 Fahrenheit
	= 358.4 Kelvin
Average Stack Flowrate for Cell 7, Q =	1284 acfm
Universal Gas Constant, R =	0.082058 L-atm/mol-K

Emissions of Hazardous Air Pollutants (HAPs)

Hazardous Air Pollutant (HAP)*	CAS Number	Molecular Weight (g/mol)	Maximum Concentration (Tennessee Plant)* (ppbv)	Maximum Emissions (Tennessee Plant)* (tons/year)	PTE of HAPs (Valparaiso Plant)** (tons/year)
Chloromethane (Methyl Chloride)	74-87-3	50.5	6	2.2E-04	7.0E-04
1,3-Butadiene (Methyl Ethyl Ketone)	106-99-0	54	24	9.3E-04	3.0E-03
Methylene Chloride (Dichloromethane)	75-09-2	85	650	0.040	0.128
2-Butanone	78-93-3	72	8	4.1E-04	1.3E-03
Benzene	71-43-2	78	20	1.1E-03	3.6E-03
Toluene	108-88-3	92	20	1.3E-03	4.3E-03
m- and p-Xylene	1330-20-7	106	11	8.3E-04	2.7E-03
Total HAPs for UL-1 and UI-2(tons/year)					0.14
Total HAPs for UL-3 and UI-4(tons/year)					0.14

* Maximum emissions of HAPs were calculated using maximum HAP concentration data obtained from stack testing similar Ultralite Cells (Cell 3 and Cell 7), average stack temperature (Cell 7), and average stack flowrate (Cell 7), performed on August 14, 2003, at the UGN, Inc. plant in Jackson, Tennessee.

** The source estimated the potential emission from each curing oven at the accelerated throughput rate of 936 lb/hr (0.468 tons/hr) of padding and increased oven temperatures by assuming a 3.23 fold increase in the VOC emissions as compared to the stack test data from the Jackson, Tennessee plant. Therefore, potential HAP emissions for the Valparaiso Plant were estimated by multiplying the maximum emission from the Tennessee Plant by 3.23.

*** This spreadsheet was taken from MPR to MSOP No.: 127-21099-00072, issued May 11, 2005. Note that UL-3 and UL-4 are identical to UL-1 and UL-2.

METHODOLOGY

Emissions for each HAP was calculated for this system as follows:

$$E = \frac{(C) * (MW) * (Q)}{c} * \frac{(28.317 \text{ L/cf}) * (60 \text{ min/hr}) * (8760 \text{ hr/yr})}{(1E+06 \text{ L/million L}) * (453.59 \text{ g/lb}) * (2000 \text{ lb/ton}) * (1000 \text{ ppbv/ppmv})}$$

$$\text{where } c = \frac{(R) * (T)}{(P)}$$

E = Emission Rate in pounds per year (tons/yr)

C = Exhaust gas concentration in parts per billion by volume (ppbv)

MW = Molecular Weight in g/mol of compound

Q = Air flow rate in cubic feet per minute (cfm)

R = Universal Gas Constant (0.082058 L-atm/mol-K)

T = Temperature (in degrees Kelvin)

P = Atmospheric pressure (assumed 1 atm)

Appendix A: Emission Calculations
Spray Booths PVC-1 and PVC-2

Company Name: UGN, Inc.
Address: 2252 Industrial Drive, Valparaiso, Indiana 46383
NOC to MSOP: 127-23483
Plant ID: 127-00072
Reviewer: ERG/SD
Date: September 5, 2006

Emission Unit	Units	Max. Usage Rate (parts/hour)	Max. Adhesive Rate (lbs/part)	Weight % Solids	Transfer Rate %	PTE of PM/PM10 (tons/year)
Spray Booths	2	100	0.149	65%	75%	21.2

TOTAL

According to the Permittee, adhesive is applied using an airless spray gun on a flat surface.

METHODOLOGY

Potential To Emit of PM/PM10 (tons/year) = Max. Usage Rate (parts/hour) * Max. Adhesive Rate (lbs/part) * No. of Booths * Weight % Solids * (1-Transfer Rate %) * 8760 hours/year * 1 ton/2000 lbs

Emission Unit	Units	Max. Usage Rate (parts/hour)	Max. Adhesive Rate (lbs/part)	Weight % VOC	Transfer Rate %	PTE of VOC (tons/year)	Weight % HAP	PTE of HAP (tons/year)
Spray Booths	2	100	0.149	1.70%	NA	2.22	0.15%	0.196

METHODOLOGY

Potential To Emit of VOC/HAP (tons/year) = Max. Usage Rate (parts/hour) * Max. Adhesive Rate (lbs/part) * No. of Booths * Weight % VOC/HAP * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Summary**

Company Name: UGN, Inc.

Address: 2252 Industrial Drive, Valparaiso, Indiana 46383

NOC to MSOP: 127-23483

Plant ID: 127-00072

Reviewer: ERG/SD

Date: September 5, 2006

UNCONTROLLED POTENTIAL TO EMIT IN TONS PER YEAR

New Emission/Process Units	PM	PM10	SO₂	NO_x	VOC	CO	HAPs
Four New NG-Fired Cure Ovens	0.08	0.31	0.02	4.12	0.23	3.46	0.07
UL-3 and UL-4	11.80	11.80			2.02		0.14
Existing Source Emissions							
Combustion Units*	1.02	1.02	0.08	13.4	0.74	11.2	0.25
Headliner Spray booth HL-1*	10.7	10.7	0	0	0.06	0	0.008
Misc. Products Usage/Parts Washer Clean Up Usage/Mold Cells/Mud Guard Three Cold Tank Cleaners*	24.4	24.4	0	0	7.56	0	1.00
Spray Booths (PVC-1 and PVC-2)**	21.2	21.2	0	0	2.23	0	0
4 Hot Mold Presses***	6.76	6.76	0	0	2.15	0	1.08
UL-1 and UL-2 and curing ovens****	11.90	11.90	0.02	4.12	2.25	3.46	0.21
TOTAL	87.8	87.8	0.12	21.6	17.0	18.1	2.76

Notes:

* - For emission calculations for these units see MSOP 0127-16516-00072, issued on April 22, 2003.

** - For emission calculations see page 5 of this appendix. These units were added under Notice only Change 127-18606-00072. issued March 30,2004.

*** - For emission calculations for these units see Minor Permit Revision 127-20418-00072, issued January 11, 2005.

**** - For revised emission calculations see pages 3 and 4 of this appendix. For the original calculations for these units see Minor Permit Revision 127-21099-00072, issued on May 11, 2005.