



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: September 18, 2007
RE: Thermafiber Incorporated / 169-24879-00009
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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

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Commissioner

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Indianapolis, Indiana 46204-2251
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September 18, 2007

Mr. Dan Wakefield
Thermafiber Inc., Wabash Plant
3711 Mill Street
Wabash, Indiana 46992

Re: 169-24879-00009
Significant Permit Modification to:
Part 70 Permit No.: T169-6218-00009

Dear Mr. Wakefield:

Thermafiber Inc., Wabash Plant was issued Part 70 operating permit T169-6218-00009 on January 16, 2001 for a stationary mineral wool manufacturing source. A letter requesting changes to this permit was received on March 23, 2007. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The source proposes to replace an existing baghouse with a larger baghouse to control particulate emissions from the existing fiber board cutting operation (EU-P30). There are no changes to the capacity or throughput of EU-P30.

One (1) fiber board cutting operation identified as emission unit EU-P30, with a capacity of 1600 linear feet of board per hour and 10.4 tons of fiber board per hour, originally constructed in 2002 and approved to be modified in 2007, with two (2) cutting stations controlled by a fabric filter baghouse, identified as DC-30, exhausting either externally through stack S-23 or inside the building.

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 Jason Renzaglia, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7893 to speak directly to Mr. Renzaglia. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027 and 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

Attachments

ERG/JR

cc: File - Wabash County
Wabash County Health Department
Air Compliance Section Inspector - Ryan Hillman
Compliance Data Section
Administrative and Development
Technical Support and Modeling
Billing, Licensing and Training Section – Dan Stamatkin



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

Thermafiber, Inc., Wabash Plant 3711 Mill Street Extended Wabash, Indiana 46992

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 169-6218-00009	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: January 16, 2001 Expiration Date: January 15, 2006
First Administrative Amendment 169-14244-00009	Issuance Date: May 30, 2001
Second Administrative Amendment 169-14843-00009	Issuance Date: September 18, 2001
Third Administrative Amendment 169-15023-00009	Issuance Date: November 5, 2001
First Significant Permit Modification 169-15153-00009	Issuance Date: April 9, 2002
Administrative Amendment 169-17137-00009	Issuance Date: February 17, 2003
Administrative Amendment 169-17232-00009	Issuance Date: May 27, 2003
Second Significant Permit Modification No.: 169-24879-00009	Pages Affected: Entire Permit
Issued by: <i>Original signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: September 18, 2007

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Stratospheric Ozone Protection

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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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary mineral wool manufacturing source.

Source Address:	3711 Mill Street Extended, Wabash, Indiana 46992
Mailing Address:	3711 Mill Street Extended, Wabash, Indiana 46992
General Source Phone Number:	260 - 563 - 2111
SIC Code:	3296
County Location:	Wabash
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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

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

- (a) One (1) coke-fueled cupola #2, known as EU-P2, installed in 1955, and refurbished in 1995, natural gas supplemented, equipped with a baghouse, exhausting through Stack S1, installed in 2003, capacity: 7.0 tons of minerals per hour.
- (b) One (1) coke-fueled cupola #4, known as EU-P4, installed in 1955, and refurbished in 1994, natural gas supplemented, equipped with a baghouse, exhausting through Stack S3, installed in 2003, capacity: 8.0 tons of minerals per hour.
- (c) One (1) blowchamber #4, known as EU-P6, installed in 1955, equipped with a dry media filter, exhausting through Stack S4, installed in 1992, capacity: 8.0 tons of fiberized minerals and 0.1 tons of dedusting annealing oil per hour.
- (d) One (1) natural gas-fired curing oven #2, known as EU-P7, rated at 5.7 million British thermal units per hour, exhausting through Stack S5, installed in 1955, and replaced in 1976 through 1978, capacity: 7.0 tons of fiberized minerals per hour.
- (e) One (1) blowchamber #2, known as EU-P8, equipped a dry media filter, exhausting through Stack S6, installed in 1955, replaced in 1978 and refurbished in 1999, capacity: 7.0 tons of fiberized minerals and 1.4 tons of binder and water per hour.
- (f) One (1) #2 line trimming/sizing section, known as EU-P9, equipped with a baghouse, known as CE7, exhausting through Stack S7 or inside the building, installed in 1955, replaced in 1978, and reconditioned in 2003, capacity: 5.8 tons of fiberized minerals per hour.
- (g) One (1) #2 line cooling section, known as EU-P10, exhausting through Stack S8, installed in 1955, and replaced in 1978, capacity: 7.0 tons of fiberized minerals per hour.

- (h) One (1) natural gas-fired #1 boiler, known as EU-P11, rated at 12.5 million British thermal units per hour, exhausting through Stack S9, installed in January 31, 1990.
- (i) One (1) fiber bond cutting operation identified as emission unit EU-P30, with a capacity of 1600 linear feet of board per hour and 10.4 tons of fiber board per hour, originally constructed in 2002 and approved to be modified in 2007, with two (2) cutting stations controlled by a fabric filter baghouse, identified as DC-30, exhausting either externally through stack S-23 or inside the building.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

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

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. (326 IAC 6-3)
- (b) Conveyors as follows: covered conveyors for coal or coke conveying of less than or equal to 360 tons per day. (326 IAC 6-3)
- (c) Other activities or categories not previously identified (326 IAC 6-3): kiln cooling exhaust stack.
- (d) One (1) natural gas-fired boiler, known as boiler #2, rated at 4.5 million British thermal units per hour, exhausting through Stack 10, installed in 1977. (326 IAC 6-2)

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, 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 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the original date, 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.

B.3 Enforceability [326 IAC 2-7-7]

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.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

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

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

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

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

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (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 a responsible official 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.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year 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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard

Chicago, Illinois 60604-3590

- (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 2-7-5(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 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 contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (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 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) 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 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance 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. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

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

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

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

Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

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

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

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

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

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

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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 copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [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 Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 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) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][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 2-7-5(1)]

- C.1 **Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 **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.3 **Open Burning [326 IAC 4-1] [IC 13-17-9]**
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 **Incineration [326 IAC 4-2] [326 IAC 9-1-2]**
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.
- C.5 **Fugitive Dust Emissions [326 IAC 6-4]**
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 **Operation of Equipment [326 IAC 2-7-6(6)]**
Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 **Stack Height [326 IAC 1-7]**
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. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are 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 is federally enforceable.

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

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 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.10 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. 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 2-7-5(1)] [326 IAC 2-7-6(1)]

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.14 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

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

The ERP does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

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

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

C.17 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit(s) (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;
 - (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.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 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 January 1 and ending December 31. 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
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (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.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

- (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 within ninety (90) days of permit issuance.
- (c) If there is a "project" (as defined in 326 IAC 2-2-1(qq)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr)), the Permittee shall comply with the following:
 - (1) Prior to commencing the construction of the "project" (as defined in 326 IAC 2-2-1(qq)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

- (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx), for that regulated NSR pollutant, and

- (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3).
 - (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

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

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

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

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) coke-fueled cupola #2, known as EU-P2, installed in 1955, and refurbished in 1995, natural gas supplemented, equipped with a baghouse, exhausting through Stack S1, installed in 2003, capacity: 7.0 tons of minerals per hour.
- (b) One (1) coke-fueled cupola #4, known as EU-P4, installed in 1955, and refurbished in 1994, natural gas supplemented, equipped with a baghouse, exhausting through Stack S3, installed in 2003, capacity: 8.0 tons of minerals per hour.
- (c) One (1) blowchamber #4, known as EU-P6, installed in 1955, equipped with a dry media filter, exhausting through Stack S4, installed in 1992, capacity: 8.0 tons of fiberized minerals and 0.1 tons of dedusting annealing oil per hour.
- (d) One (1) natural gas-fired curing oven #2, known as EU-P7, rated at 5.7 million British thermal units per hour, exhausting through Stack S5, installed in 1955, and replaced in 1976 through 1978, capacity: 7.0 tons of fiberized minerals per hour.
- (e) One (1) blowchamber #2, known as EU-P8, equipped a dry media filter, exhausting through Stack S6, installed in 1955, replaced in 1978 and refurbished in 1999, capacity: 7.0 tons of fiberized minerals and 1.4 tons of binder and water per hour.
- (f) One (1) #2 line trimming/sizing section, known as EU-P9, equipped with a baghouse, known as CE7, exhausting through Stack S7 or inside the building, installed in 1955, replaced in 1978, and reconditioned in 2003, capacity: 5.8 tons of fiberized minerals per hour.
- (g) One (1) #2 line cooling section, known as EU-P10, exhausting through Stack S8, installed in 1955, and replaced in 1978, capacity: 7.0 tons of fiberized minerals per hour.
- (h) One (1) natural gas-fired #1 boiler, known as EU-P11, rated at 12.5 million British thermal units per hour, exhausting through Stack S9, installed in January 31, 1990.

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

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

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the two (2) cupolas (EU-P2 and EU-P4) and the curing oven (EU-P7) described in this section except when otherwise specified in 40 CFR Part 63, Subpart DDD.

D.1.2 Mineral Wool Production NESHAP [40 CFR 63, Subpart DDD]

Pursuant to 40 CFR 63.1180, the existing mineral wool cupolas, known as EU-P2 and EU-P4, and curing oven, known as EU-P7 operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR 63, Subpart DDD), with a compliance date of June 2, 2002.

D.1.3 Particulate Matter (PM) Emission Limitation for Cupolas [40CFR Part 63.1178]

Pursuant to 40 CFR Part 63.1178, at all times, except during periods of startup, shutdown, or malfunction, the particulate matter (PM) emissions from cupola #2 and cupola #4, known as EU-P2 and EU-P4, shall not exceed 0.10 pound of PM per ton of melt.

D.1.4 Formaldehyde Emission Limitation for Curing Ovens [40CFR Part 63.1179]

Pursuant to 40CFR Part 63.1179, at all times, except during periods of startup, shutdown, or malfunction, the formaldehyde emissions from curing oven #2, known as EU-P7, shall meet either of the following:

- (a) 0.06 pound of formaldehyde per ton of melt, or
- (b) Shall be reduced by at least eighty (80%) percent from the uncontrolled formaldehyde emissions.

D.1.5 Particulate Matter Limitation [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, particulate emissions from 12.5 million British thermal units per hour boiler (EU-P11) shall in no case exceed 0.522 pounds of particulate matter per million British thermal units heat input. The particulate matter emission limitation is calculated with the following equation pursuant to 326 IAC 6-2-4. The particulate matter (PM) emissions shall be limited to:

$$Pt = 1.09/Q^{0.26}$$

where, Q = the total source maximum operating capacity (17.0) in million British thermal units per hour.

D.1.6 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the PM from the two (2) cupolas (EU-P2 and EU-P4), the two (2) blowchambers (EU-P6 and EU-P8), curing oven #2 (EU-P7), line trimmings/sizing section (EU-P9) and #2 Line cooling section (EU-P10) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

- (a) The particulate matter (PM) emissions from the cupola #2 (EU-P2) shall not exceed 15.1 pounds per hour for a process weight rate (P) of 7.0 tons per hour.
- (b) The particulate matter (PM) emissions from the cupola #4 (EU-P4) shall not exceed 16.5 pounds per hour for a process weight rate (P) of 8.0 tons per hour.
- (c) The particulate matter (PM) emissions from the blowchamber #4 (EU-P6) shall not exceed 16.7 pounds per hour for a process weight rate (P) of 8.1 tons per hour.
- (d) The particulate matter (PM) emissions from the blowchamber #2 (EU-P8) shall not exceed 17.1 pounds per hour for a process weight rate (P) of 8.4 tons per hour.
- (e) The particulate matter (PM) emissions from the curing oven #2 (EU-P7) shall not exceed 15.1 pounds per hour for a process weight rate (P) of 7.0 tons per hour.
- (f) The particulate matter (PM) emissions from the line trimming/sizing section #2 (EU-P9) shall not exceed 13.3 pounds per hour for a process weight rate (P) of 5.8 tons per hour.
- (g) The particulate matter (PM) emissions from the #2 line cooling section (EU-P10) shall not exceed 15.1 pounds per hour for a process weight rate (P) of 7.0 tons per hour.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the two (2) cupolas (EU-P2 and EU-P4), the one (1) curing oven #2 (EU-P7), the two (2) blowchambers (EU-P6 and EU-P8), the #2 line cooling section (EU-P10) and the boiler (EU-P11) and their control devices.

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.1.8 Free-Formaldehyde Content for Curing Ovens [40CFR Part 63.1183]

Pursuant 40 CFR 63.1183, the Permittee shall maintain the free-formaldehyde content of each resin lot and the formaldehyde content of each binder formulation at or below the specification ranges established during the performance test.

D.1.9 Incinerator Operating Temperature Maintenance [40CFR Part 63.1183]

Pursuant to 40 CFR 63.1183, the Permittee shall maintain the operating temperature of the incinerator at all times, except during periods of startup, shutdown, or malfunction, so that the average operating temperature for each three (3)-hour block period never falls below the average temperature established during the performance test.

D.1.10 Compliance Demonstration [40CFR Part 63.1190]

(a) The Permittee shall use the following equation to demonstrate compliance with the PM emission limit specified in Condition D.1.3 for the cupolas:

$$E = \frac{C \times O \times K_1}{P}$$

where: E = Emission rate of PM, kg/Mg (lb/ton) of melt.
C = Concentration of PM, g/dscm (gr/dscf).
Q = Volumetric flow rate of exhaust gases, dscm/hr (dscf/hr).
K₁ = Conversion factor, 1 kg/1,000 g (1 lb/7,000 gr).
P = Average melt rate, Mg/hr (ton/hr).

(b) The Permittee shall use the following equation to demonstrate compliance with the formaldehyde emission limit specified in Condition D.1.4 for the curing oven:

$$E = \frac{C \times MW \times O \times K_1 \times K_2}{K_3 \times P \times 10^6}$$

where: E = Emission rate of measured pollutant, kg/Mg (lb/ton) of melt.
C = Measured volume fraction of pollutant, ppm.
MW = Molecular weight of measured pollutant, g/g-mole.
CO = 28.01, Formaldehyde = 30.03.
Q = Volumetric flow rate of exhaust gases, dscm/hr (dscf/hr).
K₁ = Conversion factor, 1 kg/1,000 g (1 lb/453.6 g).
K₂ = Conversion factor, 1,000 L/m³ (28.3 L/ft³).
K₃ = Conversion factor, 24.45 L/g-mole.
P = Average melt rate, Mg/hr (ton/hr).

(c) The Permittee shall use the following equation to demonstrate compliance with the formaldehyde percent reduction performance standard specified in Condition D.1.4 for the curing oven:

$$\%R = \frac{L_i - L_o}{L_i} \times 100$$

- where: %R = Percent reduction, or collection efficiency of the control device.
L_i = Inlet loading of pollutant, kg/Mg (lb/ton).
L_o = Outlet loading of pollutant, kg/Mg (lb/ton).

D.1.11 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11] [40 CFR Part 63.1185(a) and 40 CFR Part 63.1188]

The Permittee shall complete the following performance testing to demonstrate compliance with the requirements of 326 IAC 6-3-2 and Subpart DDD no later than the June 2, 2002; or by June 3, 2003 if the Permittee applies for and receives a one- (1-)year extension under section 112(i)(3)(B) of the Clean Air Act.

- (a) The Permittee shall perform testing in order to demonstrate compliance with Condition D.1.6 of the two (2) cupolas (EU-P2 and EU-P4) for PM utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) The Permittee shall conduct a performance test in order to demonstrate compliance with Condition D.1.3 of each cupola for PM as specified in 40 CFR 63.1188 utilizing methods as approved by the Commissioner and show compliance with the PM emission limits while the bag leak detection system is installed, operational, and properly adjusted.
- (c) The Permittee shall conduct a performance test in order to demonstrate compliance with Condition D.1.4 of the curing oven for formaldehyde as specified in 40 CFR Part 63.1188 utilizing methods as approved by the Commissioner while manufacturing the product that requires a binder formulation made with the resin containing the highest free-formaldehyde content specification range. The Permittee shall show compliance with the formaldehyde emission limits while the device for measuring incinerator operating temperature is installed, operational, and properly calibrated. The Permittee shall establish the average operating temperature as specified in 40CFR Part 63.1185(a).

During the performance test for the curing oven that uses the binder formulation made with the resin containing the highest free-formaldehyde content specification range, record the free-formaldehyde content specification range of the resin used, and the formulation of the binder used, including the formaldehyde content and binder specification.

D.1.12 Particulate Matter (PM)

- (a) In order to comply with Conditions D.1.3 and D.1.6, the baghouses for PM control shall be in operation and control emissions from the cupolas and the trimming section, respectively, at all times that the cupolas and/or trimming section are in operation.
- (b) In order to comply with Conditions D.1.6, the media filters for PM control shall be in operation at all times when the blowchambers #2 and/or #4 are in operation.
- (c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR Part 63]

D.1.13 Visible Emissions Notations

- (a) Visible emission notations of the two (2) cupolas (EU-P2 and EU-P4), the two (2) blowchambers (EU-P6 and EU-P8), curing oven #2 (EU-P7), line trimmings/sizing section (EU-P9) and the #2 line cooling section (EU-P10) stack exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. 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 emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.14 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the multiclones and side stream baghouses used in conjunction with the two (2) cupolas, at least once per day when either or both of the cupolas are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the multiclones and baghouses is outside the normal range of 2.8 and 14.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside of the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The Permittee shall record the pressure drop across the baghouse used in conjunction with the trimming/sizing section, at least once per day when the trimming/sizing processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.2 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside of the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a violation of this permit. The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.15 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

D.1.16 Dry Media Filter Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for each blowchamber (EU-P6 and EU-P8). To monitor the performance of the dry filters, weekly observations shall be made of the particulate matter from the blowchamber stacks S4 and S6 while one or more of the blowchambers are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the blowchamber emissions from the stacks and the particulate matter 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 particulate matter emission, or evidence of particulate matter emission is observed. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.1.17 Cupola Bag Leak Detection System [40CFR Part 63.1178, 1181, 1184 and 1185] [40CFR Part 64.8(b) through (d)]

- (a) To be in compliance with the PM emission limit, pursuant to 40CFR Part 63.1181, the Permittee shall:
 - (1) Install, adjust, maintain, and continuously operate a bag leak detection system for each fabric filter pursuant to 40CFR Part 63.1184.
 - (2) Begin corrective actions specified in the operations, maintenance, and monitoring plan required by 40CFR Part 63.1187 within one (1) hour after the alarm on a bag leak detection system sounds. Complete the corrective actions in a timely manner.
 - (3) Develop and implement a written QIP consistent with compliance assurance monitoring requirements of 40CFR Part 64.8(b) through (d) when the alarm on a

bag leak detection system sounds for more than five (5%) percent of the total operating time in a six (6)-month reporting period.

- (b) Pursuant to 40CFR Part 63.1178, the operating limits for each cupola are as follows:
- (1) Begin within one hour after the alarm on a bag leak detection system sounds, and complete in a timely manner, corrective actions as specified in by the operations, maintenance, and monitoring plan required by 40CFR 63.1178, and
 - (2) When the alarm on a bag leak detection system sounds for more than five (5%) percent of the total operating time in a six (6)-month reporting period, the Permittee shall develop and implement a written quality improvement plan (QIP) consistent with the compliance assurance monitoring requirements of 40CFR 64.8(b)–(d).

D.1.18 Incinerator Operating Temperature [40CFR Part 63.1185]

Pursuant to 40CFR Part 63.1185(b), to comply with the requirements for maintaining the operating temperature of an incinerator after the performance test, the Permittee shall measure and record the average operating temperature of the incinerator as required by 40 CFR Parts 63.1182 and 63.1183 of this subpart. This average operating temperature of the incinerator is based on the arithmetic average of the one-hour average temperatures for each consecutive three-hour period and is determined in the same manner described in paragraphs (a)(1) through (a)(4) of 40CFR Part 1185.

D.1.19 Free-Formaldehyde Content for the Curing Oven [40CFR Part 63.1179] [40CFR Part 63.1183]

- (a) Pursuant to 40CFR Part 63.1183, the Permittee shall:
- (1) Install, calibrate, maintain, and operate a device that continuously measures the operating temperature in the firebox of each thermal incinerator.
 - (2) Following the performance test for the curing oven, the Permittee shall monitor and record the free-formaldehyde content of each resin lot and the formulation of each batch of binder used, including the formaldehyde content.
 - (3) Maintain the free-formaldehyde content of each resin lot and the formaldehyde content of each binder formulation at or below the specification ranges established during the performance test.

- (b) Pursuant to 40CFR Part 63.1179, the Permittee shall meet the following operating limits:

Maintain the free-formaldehyde content of each resin lot and the formaldehyde content of each binder formulation at or below the specification ranges of the resin and binder used during the performance test.

D.1.20 Incinerator Operating Temperature for the Curing Oven [40CFR Part 63.1183]

- (a) Pursuant to 40 CFR Part 63.1179, the Permittee shall meet the following operating limits:

Maintain the operating temperature of the incinerator so that the average operating temperature for each three-hour block period never falls below the average temperature established during the performance test.

- (b) Pursuant to 40 CFR Part 63.1183, the Permittee shall:

- (1) Following the performance test of the curing oven, measure and record the average operating temperature of the incinerator as specified in 40CFR Part 63.1185(b).
- (2) Operate and maintain the incinerator as specified in the operations, maintenance, and monitoring plan required by 40CFR Part 63.1187.

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

D.1.21 Record Keeping Requirements

- (a) To document compliance with Condition D.1.13, the Permittee shall maintain records of visible emission notations of the two (2) cupolas (EU-P2 and EU-P4), the two (2) blow-chambers (EU-P6 and EU-P8), curing oven #2 (EU-P7), line trimmings/sizing section (EU-P9 and the #2 Line cooling section (EU-P10) stack exhausts once per day.
- (b) To document compliance with Condition D.1.14, the Permittee shall maintain the following:
 - (1) Records once per day of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) pressure drop; and
 - (B) Cleaning cycle operation.
 - (2) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.1.18, the Permittee shall maintain a log of weekly particulate matter observations, daily and monthly inspections.
- (d) The Permittee shall maintain monthly records of the amount and type of fuel burned in #1 boiler EU-P11 pursuant to 40 CFR 60 Subpart Dc
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.22 Record Keeping Requirements [40CFR Part 63.10(b)]

Pursuant to 40CFR Part 63.10(b), the Permittee shall:

Maintain files of all information for the two (2) cupolas (EU-P2 and EU-P4) and the curing oven (EU-P7) required by 40CFR Part 63.10(b) of the general provisions in Subpart A of this part, including all notifications and reports.

D.1.23 Record Keeping Requirements [40CFR Part 63.1192]

- (a) Maintain records of the following information:
 - (1) Cupola production (melt) rate (tons per hour) of melt.
 - (2) All bag leak detection system alarms. Include the date and time of the alarm, when corrective actions were initiated, the cause of the alarm, an explanation of the corrective actions taken, and when the cause of the alarm was corrected.
 - (3) The free-formaldehyde content of each resin lot and the binder formulation, including formaldehyde content, of each binder batch used in the manufacture of bonded products.

- (4) Incinerator operating temperature and results of incinerator inspections. For all periods when the average temperature in any three-hour block period fell below the average temperature established during the performance test, and all periods when the inspection identified incinerator components in need of repair or maintenance, include the date and time of the problem, when corrective actions were initiated, the cause of the problem, an explanation of the corrective actions taken, and when the cause of the problem was corrected.
- (b) Retain each record for at least five (5) years following the date of each occurrence, measurement, corrective action, maintenance, record, or report. The most recent two (2) years of records must be retained at the facility. The remaining three (3) years of records may be retained off site.

The Indiana state rule cited in Section C - General Record Keeping is more stringent and therefore the Permittee shall maintain the most recent three(3) years of records at the source.

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

D.1.24 Reporting Requirements [40CFR 63.10(d) and 40CFR 63.1193]

- (a) A semi-annual summary of the information to document compliance with the natural gas fired boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Pursuant to 40 CFR Part 63.1193, the Permittee shall prepare and submit reports to the IDEM, OAQ as required by this subpart and 40CFR Part 63.10 of the general provisions in Subpart A of this part. The reports submitted by the Permittee do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). These reports include, but are not limited to, the following:
 - (1) A performance test report, as required by 40CFR Part 63.10(d)(2) of the general provisions in Subpart A of this part, that documents the process and control equipment operating parameters during the test period, the test methods and procedures, the analytical procedures, all calculations, and the results of the performance tests.
 - (2) A startup, shutdown, and malfunction plan, as described in 40CFR Part 63.6(e)(3) of the general provisions in Subpart A of this part, that contains specific procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and control systems used to comply with the emission standards. In addition to the information required by 40CFR Part 63.6(e)(3), the plan must include the following:
 - (i) Procedures to determine and record what caused the malfunction and when it began and ended.
 - (ii) Corrective actions you will take if a process or control device malfunctions, including procedures for recording the actions taken to correct the malfunction or minimize emissions.

- (iii) An inspection and maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
- (3) A report of each event as required by 40CFR Part 63.10(b) of the general provisions in subpart A of this part, including a report if an action taken during a startup, shutdown, or malfunction is inconsistent with the procedures in the plan as described in 40CFR Part 63.6(e)(3) of the general provisions in Subpart A of this part.
- (4) An operations, maintenance, and monitoring plan as specified in 40CFR Part 63.1187 of this subpart.
- (5) A semiannual report as required by 40CFR Part 63.10(e)(3) of the general provisions in Subpart A of this part if measured emissions exceed the applicable standard or a monitored parameter varies from the level established during performance testing. The report must contain the information specified in 40CFR Part 63.10(c) of the general provisions, as well as the relevant records required by 40CFR Part 63.1192(b) of this Subpart.
- (6) A semiannual report stating that no excess emissions or deviations of monitored parameters occurred during the reporting period as required by 40CFR Part 63.10 (e)(3)(v) of the general provisions in Subpart A of this part if no deviations have occurred.
- (7) Report the required information on paper or on a labeled computer disk using commonly available and compatible computer software.

D.1.25 Notification Requirements [40CFR Part 63.1191]

Pursuant to 40CFR Part 63.1191, the Permittee shall submit written notifications to the address listed in Section C - General Reporting Requirements as required by 40CFR 63.9(b - h) of the General Provisions in Subpart A of 40 CFR Part 63.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (i) One (1) fiber bond cutting operation identified as emission unit EU-P30, with a capacity of 1600 linear feet of board per hour and 10.4 tons of fiber board per hour, originally constructed in 2002 and approved to be modified in 2007, with two (2) cutting stations controlled by a fabric filter baghouse, identified as DC-30, exhausting either externally through stack S-23 or inside the building.

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

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

D.2.1 PSD Minor Limits [326 IAC 2-2]

- (a) The PM emissions from emission unit EU-P30 shall be limited to less than 5.7 pounds per hour. Compliance with this limit will ensure that the emissions increase from this modification is less than twenty-five (25) tons of PM per year. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.
- (b) The PM10 emissions from emission unit EU-P30 shall be limited to less than 3.42 pounds per hour. Compliance with this limit will ensure that the emissions increase from this modification is less than fifteen (15) tons of PM10 per year. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

D.2.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the fiber bond cutting operation (EU-P30) shall not exceed 19.7 pounds per hour when operating at a process weight rate of 10.4 tons per hour. The pound per hour limitation was calculated with 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.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan (PMP), in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the fiber bond cutting operation (EU-P30) and its control device.

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.2.4 Particulate Control [326 IAC 2-2][326 IAC 6-3-2]

- (a) In order to comply with Conditions D.2.1 and D.2.2, the baghouse for particulate control shall be in operation and control emissions from the fiber bond cutting operation (EU-P30) at all times that the fiber bond cutting operation (EU-P30) is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also

include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.5 Visible Emissions Notations [326 IAC 2-7-5(3)(A)(iii)][326 IAC 2-7-5(d)]

- (a) Visible emission notations of the fiber bond cutting operation (EU-P30) baghouse stack exhaust shall be performed once per day during normal daylight operations when venting to the atmosphere. 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 emissions are observed, the Permittee shall take reasonable steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.2.6 Baghouses Parametric Monitoring [326 IAC 2-7-5(3)(A)(iii)][326 IAC 2-7-5(d)]

The Permittee shall record the pressure drop across the baghouse used in conjunction with the fiber bond cutting operation (EU-P30) at least once per day when the fiber bond cutting operation (EU-P30) is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the range of 1 and 7 inches of water or a range established during the latest stack test, the Permittee shall take reasonable steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.2.7 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain once per day records of visible emission notation readings at the fiber bond cutting operation (EU-P30) baghouse stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of once per day pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (a) One (1) natural gas-fired boiler, known as boiler #2, rated at 4.5 million British thermal units per hour, exhausting through Stack 10, installed in 1977. (326 IAC 6-2)
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. (326 IAC 6-3)
- (c) Conveyors as follows:
 - Covered conveyors for coal or coke conveying of less than or equal to 360 tons per day. (326 IAC 6-3)
- (d) Other activities or categories not previously identified (326 IAC 6-3): kiln cooling exhaust stack

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

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

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the brazing equipment, cutting torches, soldering equipment, and/or welding equipment as well as from the covered conveyors for coal or coke conveying, and the kiln cooling exhaust stack shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 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.3.2 Particulate Matter Limitation [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (e), particulate emissions from the 4.5 million British thermal units per hour natural gas boiler#2 used for indirect heating purposes which began operations after June 8, 1972, shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Thermafiber, Inc., Wabash Plant
Source Address: 3711 Mill Street Extended, Wabash, Indiana 46992
Mailing Address: 3711 Mill Street Extended, Wabash, Indiana 46992
Part 70 Permit No.: T169-6218-00009

**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**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Thermafiber, Inc., Wabash Plant
Source Address: 3711 Mill Street Extended, Wabash, Indiana 46992
Mailing Address: 3711 Mill Street Extended, Wabash, Indiana 46992
Part 70 Permit No.: T169-6218-00009

This form consists of 2 pages

Page 1 of 2

This is an emergency as defined in 326 IAC 2-7-1(12)

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

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

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

Source Name: Thermafiber, Inc., Wabash Plant
Source Address: 3711 Mill Street Extended, Wabash, Indiana 46992
Mailing Address: 3711 Mill Street Extended, Wabash, Indiana 46992
Part 70 Permit No.: T169-6218-00009

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

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel

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:

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

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Thermafiber, Inc., Wabash Plant
Source Address: 3711 Mill Street Extended, Wabash, Indiana 46992
Mailing Address: 3711 Mill Street Extended, Wabash, Indiana 46992
Part 70 Permit No.: T169-6218-00009

Months: _____ to _____ Year: _____

Page 1 of 2

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

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

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

- No deviation occurred in this month.
- Deviation/s occurred in this month.

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**

**Technical Support Document (TSD) for a
Significant Permit Modification to a Part 70 Operating Permit**

Source Description and Location

Source Name:	Thermafiber Inc., Wabash Plant
Source Location:	3711 Mill Street, Wabash, Indiana 46992
County:	Wabash
SIC Code:	3296
Operation Permit No.:	169-6218-00009
Operation Permit Issuance Date:	January 16, 2001
Significant Permit Modification No.:	169-24879-00009
Permit Reviewer:	ERG/JR

Existing Approvals

The source was issued Part 70 Operating Permit No. T169-6218-00009 on January 16, 2001. The source has since received the following approvals:

- (a) Administrative Amendment 169-14244-00009, issued on May 30, 2001;
- (b) Administrative Amendment 169-14843-00009, issued on September 18, 2001;
- (c) Administrative Amendment 169-15023-00009, issued on November 5, 2001;
- (d) First Significant Permit Modification 169-15153-00009, issued on April 9, 2002;
- (e) Administrative Amendment 169-17137-00009, issued on February 17, 2003;
- (f) Administrative Amendment 169-17232-00009, issued on May 27, 2003; and
- (g) Pending Part 70 Renewal 169-21103-00009, application received on April 11, 2005 and under review.

County Attainment Status

The source is located in Wabash County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx are considered when evaluating the rule applicability relating to ozone. Wabash County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – 326 IAC 2-2 section of this document for more information.
- (b) Wabash County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.
- (c) Wabash County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).
- (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 in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are counted toward the determination of PSD and Emission Offset applicability.

Source Status

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Potential to Emit (tons/year)
PM	greater than 100
PM10	greater than 100
SO ₂	greater than 100
VOC	greater than 100
CO	greater than 100
NO _x	greater than 100

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant is emitted at a rate of 100 tons per year or more, and it is in one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) These emissions are based upon previous approvals issued to this source.

The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

HAPs	Potential to Emit (tons/year)
Single HAP	greater than 10
Total HAPs	greater than 25

This existing source is a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM10	96
PM2.5	83
SO ₂	27
VOC	110
CO	7,628
NO _x	52
Pb	0

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Thermafiber Inc. on March 23, 2007, relating to the replacement of an existing baghouse controlling particulate emissions from the existing fiber board cutting operation (EU-P30). Before this modification, the existing fiber board cutting operation (EU-P30) was considered an insignificant activity because the existing baghouse met the criteria under 326 IAC 2-7-1(21)(G)(xxiii) (0.03 gr/dscf particulate matter (PM) control level exhausting at 4,000 cfm or less). The fiber board cutting operation was not explicitly listed in the original Title V permit, but rather was included under the general grinding and machining insignificant activity category (326 IAC 2-7-1(21)(G)(xxiii)). The new baghouse will have an exhaust flow rate greater than 4,000 cfm; therefore, EU-P30 will be incorporated into the Title V permit as a significant emission unit based on the new PTE using the new flow rate. There are no changes to the capacity or throughput of the existing fiberboard cutting operation.

- (i) One (1) fiber bond cutting operation identified as emission unit EU-P30, with a capacity of 1600 linear feet of board per hour and 10.4 tons of fiber board per hour, originally constructed in 2002 and approved to be modified in 2007, with two (2) cutting stations controlled by a fabric filter baghouse, identified as DC-30, exhausting either externally through stack S-23 or inside the building.

The source is requesting a PM limit of 5.7 pounds per hour and a PM10 limit of 3.42 pounds per hour on the existing fiber board cutting operation (EU-P30) to limit PM emissions to less than 25 tons per year and PM10 emissions to less than 15 tons per year. As such the requirements of PSD would not apply to this modification. See Permit Level Determination – Part 70 Section for further detail.

Thermafiber Inc. also submitted an additional application to OAQ on June 11, 2007 requesting the pressure drop range for the baghouse controlling EU-P9 be revised, and to revise the permit to reflect that the baghouse has the option to vent inside the building. The source also requested that IDEM correct the source address and remove the sand silo vent and cement silo vent from the permit since they no longer exist. This application is being combined in this significant permit modification.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S-23	fiber board cutting operation (EU-P30)	Unknown	Unknown	7,000	70

Emission Calculations

See Appendix A (page 1) of this document for detailed emission calculations.

Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

There are no changes being done to the fiber board cutting process, the source is only replacing the existing baghouse with a larger one; therefore, a source modification is not necessary. However, the modification will be incorporated into the pending Part 70 Operating Permit through a Significant Permit Modification issued pursuant to 326 IAC 2-7-12(d) because this permit modification requires a case-by-case determination of an emission limitation.

Permit Level Determination – PSD

The table below summarizes the potential to emit, reflecting all limits, of the emission units added in this source modification. Any control equipment is considered federally enforceable only after issuance of this Part 70 source modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Potential to Emit (tons/year)							
	PM	PM10	SO ₂	NO _x	CO	VOC	Lead	Beryllium
Fiber board cutting operation (EU-P30)	Less than 25	Less than 15	0.0	0.0	0.0	0.0	0.0	0.0
Total for Modification	Less than 25	Less than 15	0.0	0.0	0.0	0.0	0.0	0.0
Significant Level	25	15	40	40	100	40	0.6	0.0004

This source is considered a major PSD source. The unrestricted potential to emit of PM and PM10 of the emission unit in this source modification (EU-P30) is greater than 25 tons per year and 15 tons per year, respectively. Therefore, this source has elected to limit the potential to emit of PM and PM10 of this modification as follows:

- (a) The PM emissions from emission unit EU-P30 shall be limited to less than 5.7 pounds per hour.
- (b) The PM10 emissions from emission unit EU-P30 shall be limited less than 3.42 pound per hour.

Compliance with these limits will ensure that the emissions increase from this modification is less than twenty-five (25) tons of PM per year and fifteen (15) tons of PM10 per year therefore will

render the requirements of 326 IAC 2-2 (PSD) not applicable. This modification to an existing major stationary source is not major because the emissions increase is limited to less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification.
- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
EU-P30 (PM10)	Baghouse DC-30	Y	454	7.88	100	Y	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to emission unit EU-P30 for PM10. A CAM plan shall be submitted with the Part 70 Renewal application.

State Rule Applicability Determination

326 IAC 2-2 (Prevention of Significant Deterioration)

Thermafiber Inc. belongs to one of the twenty-eight (28) listed source categories with a PSD major source threshold of 100 tons per year. Thermafiber Inc. is a (PSD) major source. This modification to a major PSD source does not trigger PSD review because the increase in potential to emit of PM, PM10, and PM2.5 is limited to less than the PSD significant levels. See the discussion above in the Permit Level Determination – PSD Section of this Technical Source Document for a full explanation of the issues and limits for this modification.

326 IAC 2-4.1 (New Source Toxics Control)

The fiber board cutting operation (EU-P30) does not have the potential to emit greater than ten (10) tons per year of a single HAP and greater than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply to this modification.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. In accordance with the compliance schedule in 326 IAC 2-6-3, the source has a potential to emit annual carbon monoxide emissions greater than two thousand five hundred (2,500) tons per year; therefore, an emission statement must be submitted annually, by July 1. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability - Individual Facilities

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

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the fiber board cutting operation (EU-P30) shall not exceed 19.7 pounds per hour when operating at a process weight rate of 10.4 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

The baghouse shall be in operation at all times the fiber board cutting operation (EU-P30) is in operation, in order to comply with this limit.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

Control/Emission Point	Parameter	Frequency	Range	Excursions and Exceedances
Baghouse DC-30	Visible Emissions	Daily	Normal-Abnormal	Response Steps
Baghouse DC-30	Pressure Drop	Daily	1 - 7 inches	Response Steps

These monitoring conditions are necessary because the baghouse controlling emissions from the fiber board cutting operation (EU-P30) must operate properly to ensure compliance with 326 IAC 6-3-2, 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70).

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 169-6218-00009. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**. The Table of Contents has been updated as necessary.

1. The description and requirements for the fiber board cutting operation (EU-P30) have been added to the permit as follows. Because there are no emission standards and compliance monitoring specifically applicable to the original facilities listed in Section D.2; this equipment is being removed from Section D.2 and EU-P30 is added.

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

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

...

- ~~(i) Two (2) storage tanks, known as Tanks 4 and 5, capacity: 4,000 gallons of resin, each.~~
- ~~(j) Two (2) storage tanks, known as Tanks 6 and 7, capacity: 5,000 gallons of reax, each.~~
- ~~(k) One (1) storage tank, known as Tank 8, installed prior to 1960, capacity: 3,700 gallons of binder.~~
- ~~(l) One (1) binder mix tank, known as Tank 9, installed prior to 1960, capacity: 500 gallons of process fluids.~~
- (i) One (1) fiber bond cutting operation identified as emission unit EU-P30, with a capacity of 1600 linear feet of board per hour and 10.4 tons of fiber board per hour, originally constructed in 2002 and approved to be modified in 2007, with two (2) cutting stations controlled by a fabric filter baghouse, identified as DC-30, exhausting either externally through stack S-23 or inside the building.**

SECTION D.2 FACILITY OPERATION CONDITIONS

<p>Facility Description [326 IAC 2-7-5(15)]</p> <ul style="list-style-type: none"> (i) Two (2) storage tanks, known as Tanks 4 and 5, capacity: 4,000 gallons of resin, each. (j) Two (2) storage tanks, known as Tanks 6 and 7, capacity: 5,000 gallons of reax, each. (k) One (1) storage tank, known as Tank 8, installed prior to 1960, capacity: 3,700 gallons of binder.

- (i) ~~One (1) binder mix tank, known as Tank 9, installed prior to 1960, capacity: 500 gallons of process fluids.~~
- (i) **One (1) fiber bond cutting operation identified as emission unit EU-P30, with a capacity of 1600 linear feet of board per hour and 10.4 tons of fiber board per hour, originally constructed in 2002 and approved to be modified in 2007, with two (2) cutting stations controlled by a fabric filter baghouse, identified as DC-30, exhausting either externally through stack S-23 or inside the building.**

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

~~There are no emission standards and compliance monitoring specifically applicable to these facilities.~~

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

D.2.1 PSD Minor Limits [326 IAC 2-2]

- (a) **The PM emissions from emission unit EU-P30 shall be limited to less than 5.7 pounds per hour. Compliance with this limit will ensure that the emissions increase from this modification is less than twenty-five (25) tons of PM per year. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.**
- (b) **The PM10 emissions from emission unit EU-P30 shall be limited to less than 3.42 pounds per hour. Compliance with this limit will ensure that the emissions increase from this modification is less than fifteen (15) tons of PM10 per year. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.**

D.2.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the fiber bond cutting operation (EU-P30) shall not exceed 19.7 pounds per hour when operating at a process weight rate of 10.4 tons per hour. The pound per hour limitation was calculated with 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.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan (PMP), in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the fiber bond cutting operation (EU-P30) and its control device.

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.2.4 Particulate Control [326 IAC 2-2][326 IAC 6-3-2]

- (a) **In order to comply with Conditions D.2.1 and D.2.2, the baghouse for particulate control shall be in operation and control emissions from the fiber bond cutting operation (EU-P30) at all times that the fiber bond cutting operation (EU-P30) is in operation.**
- (b) **In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or**

replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.5 Visible Emissions Notations [326 IAC 2-7-5(3)(A)(iii)][326 IAC 2-7-5(d)]

- (a) Visible emission notations of the fiber bond cutting operation (EU-P30) baghouse stack exhaust shall be performed once per day during normal daylight operations when venting to the atmosphere. 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 emissions are observed, the Permittee shall take reasonable steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.2.6 Baghouses Parametric Monitoring [326 IAC 2-7-5(3)(A)(iii)][326 IAC 2-7-5(d)]

The Permittee shall record the pressure drop across the baghouse used in conjunction with the fiber bond cutting operation (EU-P30) at least once per day when the fiber bond cutting operation (EU-P30) is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the range of 1 and 7 inches of water or a range established during the latest stack test, the Permittee shall take reasonable steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.2.7 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the

requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.2.8 Record Keeping Requirements

-
- (a) To document compliance with Condition D.2.5, the Permittee shall maintain once per day records of visible emission notation readings at the fiber bond cutting operation (EU-P30) baghouse stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g. the process did not operate that day).
 - (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of once per day pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
 - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
2. The source has requested to remove the sand silo and cement silo under the insignificant activities because these units no longer exist at the source. The following changes have been made to the permit.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

-
- ...
 - (c) Other activities or categories not previously identified (326 IAC 6-3): ~~sand silo vent;~~ ~~cement silo vent;~~ kiln cooling exhaust stack
 - ...

SECTION D.3 FACILITY OPERATION CONDITIONS

<p>Facility Description [326 IAC 2-7-5(15)] - Insignificant Activities</p> <p>...</p> <p>(d) Other activities or categories not previously identified (326 IAC 6-3): sand silo vent; cement silo vent; kiln cooling exhaust stack</p> <p>(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)</p>
--

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

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the brazing equipment, cutting torches, soldering equipment, and/or welding equipment as well as from the covered conveyors for coal or coke conveying, ~~the sand and cement silo vents~~ and the kiln cooling exhaust stack shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

3. The source stated that the street address should not contain the word "West". IDEM, OAQ has also decided to remove the identification of the Responsible Official in Condition A.1. However, IDEM will continue to maintain records of the name, title, and contact information for the Responsible Official. IDEM, OAQ has also decided to show that this source is in 1 of 28 source categories under PSD rules. The following changes have been made to the permit:

**Thermafiber, Inc., Wabash Plant
3711 West Mill Street Extended
Wabash, Indiana 46992**

4. The source has requested that the pressure drop range for the baghouse controlling emissions from the Trimming/Sizing Section (EU-P9) be changed from a range of 0.5 to 2.0 inches of water to a range of 1.2 to 6.0 inches of water. In addition the source requests that the EU-P9 baghouse be described such that it has an option to vent inside the building (the baghouse has always had the option of venting inside the building).

The following changes have been made to the permit; some changes shown here are discussed elsewhere in this document.

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

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

...

- (f) One (1) #2 line trimming/sizing section, known as EU-P9, equipped with a baghouse, known as CE7, exhausting through Stack S7 **or inside the building**, installed in 1955, replaced in 1978, and reconditioned in 2003, capacity: 5.8 tons of fiberized minerals per hour.

...

SECTION D.1

FACILITY OPERATION CONDITIONS

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

...

- (f) One (1) #2 line trimming/sizing section, known as EU-P9, equipped with a baghouse, known as CE7, exhausting through Stack S7 **or inside the building**, installed in 1955, replaced in 1978, and reconditioned in 2003, capacity: 5.8 tons of fiberized minerals per hour.

...

D.1.14 Parametric Monitoring

- (a) The Permittee shall record the ~~total static~~ pressure drop across the multiclones and side stream baghouses used in conjunction with the two (2) cupolas, at least once per ~~shift~~ **day** when either or both of the cupolas are in operation when venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies~~

~~otherwise, shall be maintained within~~ **When for any one reading**, the pressure drop across the multiclones and baghouses ~~shall be maintained within~~ **is outside** the normal range of 2.8 and 14.0 inches of water or a range established during the latest stack test. ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and~~ **the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances.** ~~for when the A~~ pressure reading ~~that is outside of the above mentioned range for any one reading.~~ **is not a deviation from this permit.** Failure to take response steps in accordance with Section C - ~~Compliance Monitoring Plan~~ **Response to Excursions or Exceedances**, shall be considered a ~~violation of~~ **deviation from** this permit.

- (b) The Permittee shall record the ~~total static~~ pressure drop across the baghouse used in conjunction with the trimming/sizing section, at least once per ~~shift~~ **day** when the trimming/sizing processes are in operation when venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise,~~ **When for any one reading**, the pressure drop across the baghouse shall be maintained ~~within~~ **is outside** the normal range of ~~0.5 and 2~~ **1.2 and 6.0** inches of water or a range established during the latest stack test. ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and~~ **the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances.** ~~for when the A~~ pressure reading ~~that is outside of the above mentioned range for any one reading.~~ **is not a deviation from this permit.** Failure to take response steps in accordance with Section C - ~~Compliance Monitoring Plan~~ **Response to Excursions or Exceedances**, shall be considered a violation of this permit. The instrument used for determining the pressure shall comply with Section C - ~~Pressure Gauge and Other Instrument Specifications~~, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary mineral wool manufacturing source.

~~Responsible Official:~~ Plant Manager
Source Address: 3711 ~~West~~ Mill Street Extended, Wabash, Indiana 46992
Mailing Address: 3711 ~~West~~ Mill Street Extended, Wabash, Indiana 46992
General Source Phone Number: 260 - 563 - 2111
SIC Code: 3296
County Location: Wabash
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules
Major Source, Section 112 of the Clean Air Act
1 of 28 Source Categories

Upon further review, IDEM, OAQ has made the following changes:

1. The specific mail codes (MC) for each of the IDEM branches to improve mail delivery, as follows. The P.O. Box has been deleted and the zip code and contact numbers have been updated.

Indiana Department of Environmental Management
100 North Senate Avenue, ~~P. O. Box 6045~~
Permits Branch: **MC 61-53 IGCN 1003**
Compliance Branch: **MC 61-53 IGCN 1003**
Air Compliance Section: **MC 61-53 IGCN 1003**
Compliance Data Section: **MC 61-53 IGCN 1003**
Asbestos Section: **MC 61-52 IGCN 1003**
Technical Support and Modeling: **MC 61-50 IGCN 1003**
Indianapolis, Indiana ~~46206-6045~~ **46204-2251**

Telephone Number: 317-233-56740178
Facsimile Number: 317-233-59676865

2. IDEM has determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the accuracy requirements have been removed from the condition.
3. IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have been revised to reflect the new condition title.
4. IDEM has also determined that once per day of visible emission notations and once per day of monitoring of the control device is generally sufficient to ensure proper operation of the control device. IDEM has also determined that monitoring these parameters once per day is sufficient to satisfy the requirements of the Part 70 rules at 326 IAC 2-7-5 and 326 IAC 2-7-6.
5. IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit. Furthermore, the requirements to keep records of the inspections have also been removed from the permit. IDEM has also determined that it is appropriate to record pressure drop instead of total static pressure drop.
6. Indiana incorporated credible evidence provisions into state rule 326 IAC 1-1-6 consistent with the SIP call published by USEPA in 1997 (62 FR 8314) that were effective March 16, 2005; therefore, a credible evidence condition was added to the permit as Condition B.25.

The following changes have been made to the permit:

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][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.

C.14 ~~Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]~~

- (a) ~~Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed~~ **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 normal maximum reading for the normal range shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.**
- (b) ~~The Permittee may request that the IDEM, OAQ approve the use of a pressure gauge or other~~ **an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative pressure gauge or other instrument specification will**

adequately ensure compliance with permit conditions requiring the measurement of ~~pressure drop or other~~ **the** parameters.

C.17 ~~Compliance Response Plan—Failure to Take Response Steps~~ **Response to Excursions or Exceedances** [326 IAC 2-7-5] [326 IAC 2-7-6]

- ~~(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~
- ~~(1) This condition;~~
 - ~~(2) The Compliance Determination Requirements in Section D of this permit;~~
 - ~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~
 - ~~(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~
 - ~~(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:~~
 - ~~(A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and~~
 - ~~(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~
- ~~(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.~~
- ~~(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:~~
- ~~(1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.~~
 - ~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.~~
 - ~~(3) An automatic measurement was taken when the process was not operating.~~
 - ~~(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~

- ~~(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~
- ~~(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.~~
- ~~(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~
- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit(s) (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;**
 - (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.

...

SECTION D.1 FACILITY OPERATION CONDITIONS

<p>Facility Description [326 IAC 2-7-5(15)]</p> <p>...</p> <p>(f) One (1) #2 line trimming/sizing section, known as EU-P9, equipped with a baghouse, known as CE7, exhausting through Stack S7 or inside the building, installed in 1955, replaced in 1978, and reconditioned in 2003, capacity: 5.8 tons of fiberized minerals per hour.</p> <p>...</p>
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D.1.13 Visible Emissions Notations

- (a) Visible emission notations of the two (2) cupolas (EU-P2 and EU-P4), the two (2) blowchambers (EU-P6 and EU-P8), curing oven #2 (EU-P7), line trimmings/sizing section (EU-P9) and the #2 line cooling section (EU-P10) stack exhausts shall be performed once per **shift day** during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

...

- (e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an~~ **If abnormal emissions is 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 - ~~Compliance Response Plan—Failure to Take Response Steps~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.

D.1.14 Parametric Monitoring

- (a) The Permittee shall record the ~~total static~~ pressure drop across the multiclones and side stream baghouses used in conjunction with the two (2) cupolas, at least once per **shift day** when either or both of the cupolas are in operation when venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise,~~ **When for any one reading,** the pressure drop across the multiclones and baghouses ~~shall be maintained within~~ **is outside** the normal range of 2.8 and 14.0 inches of water or a range established during the latest stack test, ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. for when the~~ **A pressure reading that is outside of the above mentioned range for any one reading. is not a deviation from this permit.** Failure to take response steps in accordance with Section C - ~~Compliance Monitoring Plan—Failure to Take Response Steps~~ **Response to Excursions or Exceedances,** shall be considered a ~~violation of~~ **deviation from** this permit.
- (b) The Permittee shall record the ~~total static~~ pressure drop across the baghouse used in conjunction with the trimming/sizing section, at least once per **shift day** when the trimming/sizing processes are in operation when venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise,~~ **When for any one reading,** the pressure drop across the baghouse ~~shall be maintained within~~ **is outside** the normal range of ~~0.5 and 2~~ **1.2 and 6.0** inches of water or a range established during the latest stack test, ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. for when the~~ **A pressure reading that is outside of the above mentioned**

~~range for any one reading.~~ **is not a deviation from this permit.** Failure to take response steps in accordance with Section C - ~~Compliance Monitoring Plan~~ **Failure to Take Response Steps Response to Excursions or Exceedances**, shall be considered a violation of this permit. The instrument used for determining the pressure shall comply with Section C - ~~Pressure Gauge and Other Instrument Specifications~~, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

~~D.1.15~~ **D.1.15** Baghouse Inspections

~~An inspection shall be performed each calendar quarter of all bags controlling the cupolas and the trimming/sizing section when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.~~

~~D.1.16~~ **D.1.15** Broken or Failed Bag Detection

~~D.1.17~~ **D.1.16** Dry Media Filter Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for each blowchamber (EU-P6 and EU-P8). To monitor the performance of the dry filters, weekly observations shall be made of the particulate matter from the blowchamber stacks S4 and S6 while one or more of the blowchambers are in operation. ~~The Compliance Response Plan shall be followed whenever~~ **If a condition exists which should result in a response step, 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 - ~~Compliance Monitoring Plan~~ **Failure to Take Response Steps Response to Excursions or Exceedances**, shall be considered a violation of **deviation from** this permit.
- (b) Monthly inspections shall be performed of the blowchamber emissions from the stacks and the particulate matter 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 particulate matter emission, or evidence of particulate matter emission is observed. ~~The Compliance Response Plan shall be followed whenever~~ **If a condition exists which should result in a response step, 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 - ~~Compliance Monitoring Plan~~ **Failure to Take Response Steps Response to Excursions or Exceedances**, shall be considered a violation of **deviation from** this permit.
- (c) ~~Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

~~D.1.18~~ **D.1.17** Cupola Bag Leak Detection System [40CFR Part 63.1178, 1181, 1184 and 1185] [40CFR Part 64.8(b) through (d)]

...

~~D.1.19~~ **D.1.18** Incinerator Operating Temperature [40CFR Part 63.1185]

...

~~D.1.20~~ **D.1.19** Free-Formaldehyde Content for the Curing Oven [40CFR Part 63.1179] [40CFR Part 63.1183]

...

~~D.1.21~~ **D.1.20** Incinerator Operating Temperature for the Curing Oven [40CFR Part 63.1183]

...

~~D.1.22~~ **D.1.21** Record Keeping Requirements

- (a) To document compliance with Condition D.1.13, the Permittee shall maintain records of visible emission notations of the two (2) cupolas (EU-P2 and EU-P4), the two (2) blow-chambers (EU-P6 and EU-P8), curing oven #2 (EU-P7), line trimmings/sizing section (EU-P9 and the #2 Line cooling section (EU-P10) stack exhausts once per ~~shift~~**day**.
- (b) To document compliance with Condition D.1.14, the Permittee shall maintain the following:
 - (1) Records once ~~shift~~**day** of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) ~~Inlet and outlet differential static pressure~~ **drop**; and
 - (B) Cleaning cycle operation.
 - (2) Documentation of the dates vents are redirected.
- ~~(c)~~ To document compliance with Condition D.1.15, the Permittee shall maintain records of the results of the inspections required under Condition D.1.15 and the dates the vents are redirected.
- ~~(d)~~**(c)** To document compliance with Condition ~~D.1.17~~**D.1.18**, the Permittee shall maintain a log of weekly particulate matter observations, daily and monthly inspections, ~~and these additional inspections prescribed by the Preventive Maintenance Plan.~~
- ~~(e)~~**(d)** The Permittee shall maintain monthly records of the amount and type of fuel burned in #1 boiler EU-P11 pursuant to 40 CFR 60 Subpart Dc
- ~~(f)~~**(e)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

~~D.1.23~~ **D.1.22** Record Keeping Requirements [40CFR Part 63.10(b)]

...

~~D.1.24~~ **D.1.23** Record Keeping Requirements [40CFR Part 63.1192]

...

~~D.1.25~~ **D.1.24** Reporting Requirements [40CFR 63.10(d) and 40CFR 63.1193]

...

~~D.1.26~~ **D.1.25** Notification Requirements [40CFR Part 63.1191]

...

7. Paragraph (a) of the Broken or Failed Baghouse condition has been deleted. For multi-compartment baghouses, the permit will not specify what actions the Permittee needs to take in response to a broken bag. However, a requirement has been added to Condition D.1.12 requiring the Permittee to notify IDEM if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition.

Paragraph (b) of the Broken or Failed Baghouse condition has been revised for those processes that operate in batch mode. The condition required an emission unit to be shut down immediately in case of baghouse failure. However, IDEM is aware there can be safety issues with shutting down a process in the middle of a batch. IDEM also realizes that in some situations, shutting down an emissions unit mid-process can cause equipment damage. Therefore, since it is not

always possible to shut down a process with material remaining in the equipment, IDEM has revised the condition to state that in the case of baghouse failure, the feed to the process must be shut off immediately, and the process shall be shut down as soon as practicable.

D.1.12 Particulate Matter (PM)

...

- (c) **In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

~~D.1.16~~ D.1.15 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- ~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B - Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~
- ~~(b)~~(a) **For a single compartment baghouses controlling emissions from a process operated continuously, a failed units and the associated process will shall be shut down immediately until the failed units have has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (b) **For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

Bag failure can be indicated by a significant drop in the baghouse=s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

8. IDEM, OAQ has also decided to make changes to the record keeping and reporting requirements to reflect the NSR reform provision at the major sources.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

...

- (c) **If there is a "project" (as defined in 326 IAC 2-2-1qq)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL),**

which is not part of a “major modification” (as defined in 326 IAC 2-2-1(ee)) and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(rr)), the Permittee shall comply with the following:

- (1) Prior to commencing the construction of the “project” (as defined in 326 IAC 2-2-1(qq)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- ...
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any “project” (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
 - (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:

- (1) The name, address, and telephone number of the major stationary source.
- (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
- (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3).
- (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

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

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

9. 326 IAC 9-1-2 is now federally enforceable and Condition C.4 has been modified as shown.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. ~~326 IAC 9-1-2 is not federally enforceable.~~

Conclusion and Recommendation

The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Part 70 Significant Permit Modification No. 169-24879-00009. The staff recommends to the Commissioner that this Part 70 Significant Permit Modification be approved.

Appendix A: Emission Calculations
PM and PM10 Emissions (Existing Baghouse)
From Saw Cutting Stations (EU-P30) at Fiber Board Cutting Operation

Company Name: Thermafiber Inc., Wabash Plant
Address: 3711 West Mill Street, Wabash, IN 46992
SPM to Title V: 169-24879-00009
Reviewer: ERG/JR
Date: June 6, 2007

1. Potential to Emit PM/PM10 - Captured Emissions:

Baghouse ID	Process Description	Control Device	Outlet Grain Loading (gr/dscf)	Maximum Air Flow Rate (scfm)	PTE of PM/PM10 After Control * (lb/hr)	PTE of PM/PM10 After Control * (ton/yr)	Control Efficiency (%)	PTE of PM/PM10 Before Control (ton/yr)
DC-30	Saw Cutting	Baghouse	0.03	4,000	1.03	4.51	98.3%	265
Total						4.51		265

* Assume all PM emissions equal PM10 emissions.

Methodology

PTE of PM/PM10 After Control (lb/hr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 min/hr x 1 lb/7000 gr

PTE of PM/PM10 After Control (ton/yr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 min/hr x 1 lb/7000 gr x 8760 hr/yr x 1 ton/2000 lb

PTE of PM/PM10 Before Control (ton/yr) = PTE of PM/PM10 After Control (ton/yr) / (100% - Control Efficiency %)

**Appendix A: Emission Calculations
PM and PM10 Emissions (New Baghouse)
From Saw Cutting Stations (EU-P30) at Fiber Board Cutting Operation**

Company Name: Thermafiber Inc., Wabash Plant
Address: 3711 West Mill Street, Wabash, IN 46992
SPM to Title V: 169-24879-00009
Reviewer: ERG/JR
Date: June 6, 2007

1. Potential to Emit PM/PM10 - Captured Emissions:

Baghouse ID	Process Description	Control Device	Outlet Grain Loading (gr/dscf)	Maximum Air Flow Rate (scfm)	PTE of PM/PM10 After Control *	PTE of PM/PM10 After Control *	Control Efficiency (%)	PTE of PM/PM10 Before Control (ton/yr)
DC-30	Saw Cutting	Baghouse	0.03	7,000	1.80	7.88	98.3%	464
Total						7.88		464

* Assume all PM emissions equal PM10 emissions.

Methodology

PTE of PM/PM10 After Control (lb/hr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 min/hr x 1 lb/7000 gr

PTE of PM/PM10 After Control (ton/yr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 min/hr x 1 lb/7000 gr x 8760 hr/yr x 1 ton/2000 lb

PTE of PM/PM10 Before Control (ton/yr) = PTE of PM/PM10 After Control (ton/yr) / (100% - Control Efficiency %)