INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: January 3, 2008

RE: Foamex, LP / 003-25210-00225

FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 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, Suite N 501E, 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.

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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 impractible 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.

Enclosures
FNTV-PMOD.doc 1/2/08

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Mr. Richard Strozyk
Foamex, LP
3005 Commercial Road
Fort Wayne, IN 46809

January 3, 2008

Re: 003-25210-00225
First Significant Permit Modification to:
Part 70 Permit No.: T003-17694-00225

Dear Mr. Strozyk:

Foamex, LP was issued Part 70 operating permit T003-17694-00225 on October 14, 2004 for a stationary polyurethane foam production and foam processing plant. An application to install and operate several emission units was received on August 24, 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 (TSD).

The modification consists of certain changes as described in TSD. All other conditions of the permit remain unchanged and in effect. The revised Part 70 Operating Permit is being issued for your convenience.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Jamal Naas, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027 and ask for Jamal Naas or extension 4-5176, or dial (317) 234-5176.

Sincerely,

Original signed by
Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Attachments

JNN
cc: File – Allen County
Allen County Health Department
IDEM Air Compliance Section Inspector
Compliance Data Section
Administrative and Development
EPA Region V

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PART 70 SIGNIFICANT SOURCE MODIFICATION
OFFICE OF AIR QUALITY

Foamex, L.P.
3005 Commerical Road
Fort Wayne, Indiana 46809

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.: T003-17694-00225	
Issued by: Original Signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: October 14, 2004 Expiration Date: October 14, 2009

First Significant Permit Modification No.: 003-25210-00225	
Issued by: *Original signed by* Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: January 3, 2008 Expiration Date: October 14, 2009

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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 polyurethane foam production and foam processing plant.

Source Address:	3005 Commerical Road, Fort Wayne, Indiana 46809
Mailing Address:	3005 Commercial Road, Fort Wayne, IN 46809
General Source Phone Number:	(260) 747-7485
SIC Code:	3086
County Location:	Allen
Source Location Status:	Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) one (1) flexible slabstock polyurethane foam manufacturing process (ID No. PLC-01), producing a maximum of nine (9) million board feet per day of polyurethane foam, consisting of:

(1) two (2) mix chambers;

(2) one (1) periphlex pour line, constructed in 1968, exhausting through ten (10) stacks (ID Nos. 1-5, 9-12, and 19);

(3) one (1) ester pour line, constructed in 1968, exhausting through six (6) stacks (ID Nos. 21-26);

(4) three (3) foam bun storage areas (Carpet Underlay Mezzanine Bun Grabber Area, South Finishing Mezzanine Bun Grabber Area, and the Loaf Stacker Area), exhausting through fourteen (14) stacks (ID Nos. 13-15, 17, 18, 20, 27-33, and 49);

(b) one (1) natural gas flame laminator machine (ID No. FL-02), with a maximum capacity of 40,000 square feet per hour, and exhausting through two (2) stacks (ID Nos. 02-002 and FL2);

(c) one (1) thermal reticulation unit (ID No. TRU-01), constructed in 1968 and modified in 2007, processing a maximum of 10 cycles of polyurethane foam buns per hour, at a maximum volume of 244,296 cubic inches of foam per cycle, exhausting through nine (9) stacks (ID Nos. 35-43);

(d) one (1) 6 sheet felt press C (ID No. FPC), processing a maximum of 300,000 sheets per year, exhausting through one (1) stack (ID No. 48);

(e) one (1) 6 sheet felt press D (ID No. FPD), with a maximum foam processing rate of 300,000 sheets per year, exhausting through one (1) stack (ID No. 49);

(f) one (1) 6 sheet felt press E (ID FPE), with a maximum capacity to process foam at a rate of 35 sheets per hour, exhausting through one (1) stack (ID No. 51); and

(g) two (2) natural gas fired boilers (ID Nos. IPB-01 and IPB-02), each constructed in 1968, each rated at 12.6 million (MM) British thermal units (Btu) per hour, using No. 2 distillate fuel oil as back-up fuel, and each exhausting through one (1) stack (ID Nos. 45 and 46).

(h) one (1) thermal reticulation unit (ID No. TRU-02), approved for construction in 2007, with a maximum throughput of 87,600 cycles per year, exhausting through eight (8) stacks (ID Nos. 52-59);

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) degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (cold cleaner degreasing operation with several remote solvent reservoirs using Dynasolve CU-5 and Isosolve 2000) [326 IAC 8-3-2];

(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 6-3-2];

(c) trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone [326 IAC 6-3-2];

(d) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations [326 IAC 6-3-2];

(e) TDI storage tanks with activated carbon (TDI emissions less than 1 pound per day and 1 ton per year) [40 CFR 63, Subpart III];

(f) MDI storage tanks with MDI emissions less than 1 pound per day and 1 ton per year [40 CFR 63, Subpart III];

(g) polyol storage tanks with VOC emissions less than 3 pounds per hour or 15 pounds per day (one tank has a storage capacity of 30,000 gallons) [326 IAC 12][40 CFR 63, Subpart III];

(h) two (2) felters with VOC emissions less than 3 pounds per hour or 15 pounds per day, CO emissions less than 25 pounds per day, and PM emissions less than 5 pounds per hour or 25 pounds per day [326 IAC 6-3-2];

(i) one (1) skinner with VOC emissions less than 3 pounds per hour or 15 pounds per day, CO emissions less than 25 pounds per day, and NO_X and PM emissions less than 5

pounds per hour or 25 pounds per day [326 IAC 6-3-2];

(j) one (1) hot wire cutter with VOC emissions less than 3 pounds per hour or 15 pounds per day, CO emissions less than 25 pounds per day, and NO_X and PM emissions less than 5 pounds per hour or 25 pounds per day [326 IAC 6-3-2];

(k) bun cutters [326 IAC 6-3-2];

(l) BSR slitters [326 IAC 6-3-2];

(m) one (1) VOC blowing agent (N-ethylmorpholine) storage tank with VOC emissions less than 3 pounds per hour or 15 pounds per day [40 CFR 63, Subpart III];

(n) one (1) 20,000 gallon No. 2 fuel oil storage tank with VOC emissions less than 3 pounds per hour or 15 pounds per day [326 IAC 12];

(o) two (2) 6,000 gallon methylene chloride storage tanks [40 CFR 63, Subpart III]; and

(p) Two (2) felt presses, identified as FPA and FPF with VOC emissions less than 3 pounds per hour or 15 pounds per day, CO emissions less than 25 pounds per day, and PM emissions less than 5 pounds per hour or 25 pounds per day.

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)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

(a) This permit, T003-17694-00225, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

B.4 Enforceability [326 IAC 2-7-7]

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.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 Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "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.

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

B.8 Certification [326 IAC 2-7-4(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 the "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. One (1) certification may cover multiple forms in one (1) submittal.

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

B.9 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 no later than July 1 of each year to:

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

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.10 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 extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.11 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.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may

require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) 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) 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.

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

B.12 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) 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.

(c) 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.

(d) 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.

(e) 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).

(f) 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)]

(g) 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)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T003-17694-00225 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 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.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. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "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.

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 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(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 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(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) A timely renewal application is one that is:

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

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

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

B.18 Permit Amendment or 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 shall 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) 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 limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

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

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (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 is not considered an application form, report or compliance certification. Therefore, the notification 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 emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(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.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

A modification, construction, or reconstruction is governed by the requirements of 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][IC 13-30-3-1][IC 13-17-3-2]

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

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

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

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

B.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)][326 IAC 2-1.1-7]

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

(b) 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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

(a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 ora permit modification under326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.26 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 Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

C.2 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.

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 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 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of

326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by 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 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

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

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by 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 Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.10 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
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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.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(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.13 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
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100 North Senate Avenue
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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.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.15 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 (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][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 twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

The response action documents submitted pursuant to this condition do require the certification by the "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.17 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) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The 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).

(b) The 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.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

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

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

(c) If there is a “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) affecting an existing emissions unit, other than 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/or 326 IAC 2-3-1 (z)) and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:

(1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) 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/or 326 IAC 2-3-1(mm)(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.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "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, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "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, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

(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) and/or 326 IAC 2-3-1 (ll)) 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) and/or 326 IAC 2-3-1 (qq), 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) and/or 326 IAC 2-3-2(c)(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 46204-2251

(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.20 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) flexible slabstock polyurethane foam manufacturing process (ID No. PLC-01), producing a maximum of nine (9) million board feet per day of polyurethane foam, consisting of:

(1) two (2) mix chambers;

(2) one (1) periphlex pour line, constructed in 1968, exhausting through ten (10) stacks (ID Nos. 1-5, 9-12, and 19);

(3) one (1) ester pour line, constructed in 1968, exhausting through six (6) stacks (ID Nos. 21-26);

(4) three (3) foam bun storage areas (Carpet Underlay Mezzanine Bun Grabber Area, South Finishing Mezzanine Bun Grabber Area, and the Loaf Stacker Area), exhausting through fourteen (14) stacks (ID Nos. 13-15, 17, 18, 20, 27-33, and 49);

Insignificant Activities

(e) TDI storage tanks with activated carbon (TDI emissions less than 1 pound per day and 1 ton per year) [40 CFR 63, Subpart III];

(f) MDI storage tanks with MDI emissions less than 1 pound per day and 1 ton per year [40 CFR 63, Subpart III];

(g) polyol storage tanks with VOC emissions less than 3 pounds per hour or 15 pounds per day (one tank has a storage capacity of 30,000 gallons) [326 IAC 12][40 CFR 63, Subpart III];

(i) one (1) VOC blowing agent (N-ethylmorpholine) storage tank with VOC emissions less than 3 pounds per hour or 15 pounds per day [40 CFR 63, Subpart III];

(j) one (1) 20,000 gallon No. 2 fuel oil storage tank with VOC emissions less than 3 pounds per hour or 15 pounds per day [326 IAC 12]; and

(k) two (2) 6,000 gallon methylene chloride storage tanks [40 CFR 63, Subpart III].

(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 flexible slabstock polyurethane foam manufacturing process (ID No. PLC-01), the TDI and MDI storage tanks, the polyol storage tanks, the VOC blowing agent storage tank and the methylene chloride storage tanks, described in this section except when otherwise specified in 40 CFR Part 63, Subpart III.

D.1.2 Flexible Polyurethane Foam Production NESHAP Compliance Dates [326 IAC 2-7-5] [40 CFR Part 63.1291, Subpart III] [326 IAC 20-22-1]

(a) The foam manufacturing process at this source is a slabstock polyurethane foam manufacturing operation.

(b) Pursuant to 40 CFR 63.1291(a), the flexible slabstock polyurethane foam manufacturing process (ID No. PLC-01), the TDI and MDI storage tanks, the polyol storage tanks, the VOC blowing agent storage tank and the methylene chloride storage tanks were required to be in compliance with all provisions of this rule no later than October 8, 2001.

D.1.3 Flexible Polyurethane Foam Production NESHAP [326 IAC 2-7-5] [40 CFR Part 63.1294, Subpart III][326 IAC 20-22-1]

Pursuant to 40 CFR 63.1294, the Permittee shall comply with the provisions of the section which are as follows:

(a) Diisocyanate storage vessels.
Diisocyanate storage vessels shall be equipped with either a system meeting the requirements in paragraph (a)(1) below, or a carbon adsorption system meeting the requirements of paragraph (a)(2) below.

(1) The storage vessel shall be equipped with a vapor return line from the storage vessel to the tank truck or rail car that is connected during unloading.

(i) During each unloading event, the vapor return line shall be inspected for leaks by visual, audible, or any other detection method.

(ii) When a leak is detected, it shall be repaired as soon as practicable, but not later than the subsequent unloading event.

(2) The storage vessel shall be equipped with a carbon adsorption system, meeting the monitoring requirements of 40 CFR 63.1303(a), that routes displaced vapors through activated carbon before being discharged to the atmosphere. The Permittee shall replace the existing carbon with fresh carbon upon indication of breakthrough before the next unloading event.

(b) Transfer pumps in diisocyanate service.
Each transfer pump in diisocyanate service shall meet the requirements of paragraph (b)(1) or (b)(2) below.

(1) The pump shall be a seal less pump; or

(2) The pump shall be a submerged pump system meeting the requirements in paragraphs (b)(2)(i) through (iii) listed below.

(i) The pump shall be completely immersed in bis(2-ethylhexyl)phthalate (DEHP, CAS #118-81-7), 2(methyloctyl)phthalate (DINP, CAS #68515-48-0), or another neutral oil.

(ii) The pump shall be visually monitored weekly to detect leaks,

(iii) When a leak is detected, it shall be repaired in accordance with the procedures in paragraphs (b)(2)(iii)(A) and (B) below, except as provided in paragraph (d) below.

(A) The leak shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected.

(B) A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. First attempts at repair include, but are not limited to, the following practices where practicable:

(1) Tightening of packing gland nuts.

(2) Ensuring that the seal flush is operating at design pressure and temperature.

(c) Other components in diisocyanate service.
If evidence of a leak is found by visual, audible, or any other detection method, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in paragraph (d) below. The first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

(d) Delay of repair.

(1) Delay of repair of equipment for which leaks have been detected is allowed for equipment that is isolated from the process and that does not remain in diisocyanate service.

(2) Delay of repair for valves and connectors is also allowed if:

(i) The owner or operator determines that diisocyanate emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair, and

(ii) The purged material is collected and destroyed or recovered in a control device when repair procedures are effected.

(3) Delay of repair for pumps is also allowed if repair requires replacing the existing seal design with a seal less pump, and repair is completed as soon as practicable, but not later than 6 months after the leak was detected.

D.1.4 Flexible Polyurethane Foam Production NESHAP [326 IAC 2-7-5] [40 CFR Part 63.1299, Subpart III][326 IAC 20-22-1]

Pursuant to 40 CFR 63.1299, the Permittee shall comply with the source-wide emission limitation option provided in 40 CFR 63.1293(b) and shall control HAP ABA storage and equipment leak emissions, HAP ABA emissions from the production line, and equipment cleaning HAP emissions in accordance with the provisions in 40 CFR 63.1299. Compliance shall be determined on a rolling annual basis in accordance with 40 CFR 63.1299(a).

(a) Rolling annual compliance.
Under the rolling annual compliance provisions, actual source-wide HAP ABA storage and equipment leak emissions, HAP ABA emissions from the production line, and equipment cleaning HAP emissions are compared to allowable source-wide emissions for each consecutive 12-month period. The allowable source-wide HAP emission level is calculated based on the production for the 12-month period, resulting in a potentially different allowable level for each 12-month period. While compliance is on an annual basis, compliance shall be determined monthly for the preceding 12-month period. The actual source-wide HAP emission level for a consecutive 12-month period shall be determined using the procedures in 40 CFR 63.1299(c)(1) through (4), listed in paragraphs (b)(1) through (4) below. The allowable HAP emission level for a consecutive 12-month period shall be determined using the procedures in 40 CFR 63.1299(d), listed in paragraph (c) below.

(b) Procedures for determining actual source-wide HAP emissions.
The actual source-wide HAP ABA storage and equipment leak emissions, HAP ABA emissions from the production line, and equipment cleaning HAP emissions shall be

determined using the procedures in 40 CFR 63.1299. Actual source-wide HAP emissions for each individual month shall be determined using the procedures specified in paragraphs (b)(1) through (3) below.

(1) Actual source-wide HAP emissions for a month shall be determined using Equation 5 and the information determined in accordance with paragraphs (b)(2) and (3) below.

$$PWE_{actual} = \sum_{i}^{n} (ST_{i,\,begin} - ST_{i,\,end} + ADD_i) \qquad \text{(Equation 5)}$$

Where:

PWE_{actual} = Actual source-wide HAP ABA and equipment cleaning HAP emissions for a month, pounds/month.

n = Number of HAP ABA storage vessels.

$ST_{i,\,begin}$ = Amount of HAP ABA in storage vessel i at the beginning of the month, pounds, determined in accordance with the procedures listed in paragraph (b)(2) below.

$ST_{i,\,end}$ = Amount of HAP ABA in storage vessel i at the end of the month, pounds, determined in accordance with the procedures listed in paragraph (b)(2) below.

ADD_i = Amount of HAP ABA added to storage vessel i during the month, pounds, determined in accordance with the procedures listed in paragraph (b)(3) below.

(2) The amount of HAP ABA in a storage vessel shall be determined by monitoring the HAP ABA level in the storage vessel in accordance with 40 CFR 63.1303(d).

(3) The amount of HAP ABA added to a storage vessel for a given month shall be the sum of the amounts of all individual HAP ABA deliveries that occur during the month. The amount of each individual HAP ABA delivery shall be determined in accordance with 40 CFR 63.1303(e).

(4) Actual source-wide HAP emissions for each consecutive 12-month period shall be calculated as the sum of actual monthly source-wide HAP emissions for each of the individual 12 months in the period, calculated in accordance with paragraphs (b)(1) through (3) above.

(c) Allowable source-wide HAP emissions for a consecutive 12-month period shall be calculated as the sum of allowable monthly source-wide HAP emissions for each of the individual 12 months in the period. Allowable source-wide HAP emissions for each individual month shall be calculated using Equation 6.

$$emiss_{allow,\,month} = \sum_{j=1}^{m} \left(\sum_{i=1}^{n} \frac{(limit_i)(polyol_i)}{100} \right) j \qquad \text{(Equation 6)}$$

Where:

$emiss_{allow,\,month}$ = Allowable HAP ABA storage and equipment leak emissions, HAP ABA emissions from the production line, and equipment cleaning HAP emissions from the slabstock foam production source for the month, pounds.

m = Number of slabstock foam production lines.

$polyol_i$ =	Amount of polyol used in the month in the production of foam grade i on foam production line j, determined in accordance with 40 CFR 63.1303(b), pounds.
n =	Number of foam grades produced in the month on foam production line j.
$limit_i$ =	HAP ABA formulation limit for foam grade i, parts HAP ABA per 100 parts polyol. The HAP ABA formulation limits are determined in accordance with 40 CFR 63.1297(d).

D.1.5 Monitoring Requirements [40 CFR 63.1303, Subpart III][326 IAC 20-22-1]

Pursuant to 40 CFR 63.1303, the Permittee shall comply with each applicable monitoring provision of 40 CFR 63.1303 as listed below.

(a) Monitoring requirements for storage vessel carbon adsorption systems.
The Permittee using a carbon adsorption system to meet the requirements of 40 CFR 63.1294(a) shall monitor the concentration level of the HAP or the organic compounds in the exhaust vent stream (or outlet stream exhaust) from the carbon adsorption system at the frequency specified in (a)(1) or (2) below in accordance with either (a)(3) or (4) below.

(1) The concentration level of HAP or organic compounds shall be monitored during each unloading event, or once per month during an unloading event if multiple unloading events occur in a month.

(2) As an alternative to monthly monitoring, the Permittee can set the monitoring frequency at an interval no greater than 20 percent of the carbon replacement interval, which is established using a design analysis described below in paragraphs (a)(2)(i) through (iii).

(i) The design analysis shall consider the vent stream composition, constituent concentration, flow rate, relative humidity, and temperature.

(ii) The design analysis shall establish the outlet organic concentration level, the capacity of the carbon bed, and the working capacity of activated carbon used for the carbon bed, and

(iii) The design analysis shall establish the carbon replacement interval based on the total carbon working capacity of the carbon adsorption system and the schedule for filling the storage vessel.

(3) Measurements of HAP concentration shall be made using 40 CFR part 60, appendix A, Method 18. The measurement shall be conducted over at least one 5-minute interval during which the storage vessel is being filled.

(4) Measurements of organic compounds shall be made using 40 CFR part 60, Appendix A, Method 25A. The measurement shall be conducted over at least one 5-minute interval during which the storage vessel is being filled.

(b) Monitoring for HAP ABA and polyol added to the foam production line at the mixhead.

(1) The Permittee shall comply with the provisions in paragraph (b)(1)(i) below.

(i) The Permittee shall continuously monitor the amount of polyol added at the mixhead when foam is being poured, in accordance with paragraphs (b)(2) through (4) below.

(2) The owner or operator shall monitor either:

(i) Pump revolutions; or

(ii) Flow rate.

(3) The device used to monitor the parameter from paragraph (b)(2) shall have an accuracy to within +/- 2.0 percent of the HAP ABA being measured, and shall be calibrated initially, and periodically, in accordance with paragraph (b)(3)(i) or (ii) below.

(i) For polyol pumps, the device shall be calibrated at least once each 6 months.

(ii) For HAP ABA pumps, the device shall be calibrated at least once each month.

(4) Measurements must be recorded at the beginning and end of the production of each grade of foam within a run of foam.

(c) Monitoring of HAP ABA in a storage vessel.
The amount of HAP ABA in a storage vessel shall be determined weekly by monitoring the HAP ABA level in the storage vessel using a level measurement device that meets the criteria described in paragraphs (c)(1) and either (c)(2) or (c)(3) below.

(1) The level measurement device must be calibrated initially and at least once per year thereafter.

(2) With the exception of visually-read level measurement devices (i.e., gauge glass), the device must have either a digital or printed output.

(3) If the level measurement device is a visually-read device, the device must be equipped with permanent graduated markings to indicate HAP ABA level in the storage tank.

(d) Monitoring of HAP ABA added to a storage vessel.
The amount of HAP ABA added to a storage vessel during a delivery shall be determined in accordance with either paragraphs (d)(1), (2), or (3) of this section.

(1) The volume of HAP ABA added to the storage vessel shall be determined by recording the volume in the storage vessel prior to the delivery and the volume after the delivery, provided that the storage tank level measurement device used to determine the levels meets the criteria in paragraph (c) above.(2) The volume of HAP ABA added to the storage vessel shall be determined by monitoring the flow rate using a device with an accuracy of +/- 2.0 percent, and calibrated initially and at least once each six months thereafter.

(3) The weight of HAP ABA added to the storage vessel shall be calculated as the difference of the full weight of the transfer vehicle prior to unloading into the storage vessel and the empty weight of the transfer vehicle after unloading into the storage vessel. The weight shall be determined using a scale meeting the requirements of either paragraph (d)(3)(i) or (ii) below.

(i) A scale approved by the State or local agencies using the procedures contained in Handbook 44, Specifications, Tolerances, and Other

Technical Requirements for Weighing and Measuring Devices 1998 (incorporation by reference--see 40 CFR 63.14).

(ii) A scale determined to be in compliance with the requirements of the National Institute of Standards and Technology Handbook 44 at least once per year by a registered scale technician.

D.1.6 Volatile Organic Compounds (VOCs) [326 IAC 12]

Pursuant to 326 IAC 12, the one (1) 30,000 gallon polyol storage tank and the one (1) 20,000 gallon No. 2 fuel oil storage tank, each with a vapor pressure of less than 15.0 kPa, are subject to 40 CFR Part 60.116b, paragraphs (a) and (b) which require record keeping.

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 this facility and any control devices.

Compliance Determination Requirements

D.1.8 Testing Requirements [40 CFR 63.1304, Subpart III][326 IAC 2-7-6(1),(6)][326 IAC 20-22-1]

Pursuant to 40 CFR 63.1304, the Permittee shall use the test methods listed below, as applicable, to demonstrate compliance with Subpart III.

(a) Test method to determine foam properties.
The IFD and density of each grade of foam produced during each run of foam shall be determined using ASTM D3574-91, Standard Test Methods for Flexible Cellular Materials--Slab, Bonded, and Molded (incorporation by reference--see 40 CFR 63.14), using a sample of foam cut from the center of the foam bun. The maximum sample size for which the IFD and density is determined shall not be larger than 24 inches by 24 inches by 4 inches. For grades of foam where the Permittee has designated the HAP ABA formulation limitation as zero, the Permittee is not required to determine the IFD and density in accordance with this paragraph.

D.1.9 Compliance Demonstrations [40 CFR 63.1308, Subpart III][326 IAC 20-22-1]

Pursuant to 40 CFR 63.1308,

(a) For the Permittee, compliance with the requirements listed in paragraphs (a)(1) through (a)(2) below shall mean compliance with the requirements contained in 40 CFR 63.1293 through 63.1301, absent any credible evidence to the contrary.

(1) The requirements described in Tables 3, 4, and 5 of Subpart III; and

(2) The requirement to submit a compliance certification annually as required under 40 CFR 63.1306(g).

(b) All slabstock affected sources.
For slabstock affected sources, failure to meet the requirements contained in 40 CFR 63.1294 shall be considered a violation of this subpart. Violation of each item listed in the paragraphs (b)(1) through (b)(6) below, as applicable, shall be considered a separate violation.

(1) For the Permittee complying with 40 CFR 63.1294(a) in accordance with 40 CFR 63.1294(a)(1), each unloading event that occurs when the diisocyanate storage vessel is not equipped with a vapor return line from the storage vessel to the tank truck or rail car, each unloading event that occurs when the vapor line is not connected, each unloading event that the vapor line is not inspected for leaks as

described in 40 CFR 63.1294(a)(1)(i), each unloading event that occurs after a leak has been detected and not repaired, and each calendar day after a leak is detected, but not repaired as soon as practicable;

(2) For the Permittee complying with 40 CFR 63.1294(a) in accordance with 40 CFR 63.1294(a)(2), each unloading event that the diisocyanate storage vessel is not equipped with a carbon adsorption system, each unloading event (or each month if more than one unloading event occurs in a month) that the carbon adsorption system is not monitored for breakthrough in accordance with 40 CFR 63.1303(a)(3) or (4), and each unloading event that occurs when the carbon is not replaced after an indication of breakthrough;

(3) For the Permittee complying with 40 CFR 63.1294(a) in accordance with 40 CFR 63.1294(a)(2) through the alternative monitoring procedures in 40 CFR 63.1303(a)(2), each unloading event that the diisocyanate storage vessel is not equipped with a carbon adsorption system, each time that the carbon adsorption system is not monitored for breakthrough in accordance with 40 CFR 63.1303(a)(3) or (4) at the interval established in the design analysis, and each unloading event that occurs when the carbon is not replaced after an indication of breakthrough;

(4) For the Permittee complying with 40 CFR 63.1294(b) in accordance with 40 CFR 63.1294(b)(1), each calendar day that a transfer pump in diisocyanate service is not a seal less pump;

(5) For the Permittee complying with 40 CFR 63.1294(b) in accordance with 40 CFR 63.1294(b)(2), each calendar day that a transfer pump in diisocyanate service is not submerged as described in 40 CFR 63.1294(b)(2)(i), each week that the pump is not visually monitored for leaks, each calendar day after 5 calendar days after detection of a leak that a first attempt at repair has not been made in accordance with 40 CFR 63.1294(b)(2)(iii)(B), and the earlier of each calendar day after 15 calendar days after detection of a leak that a leak is not repaired, or a leak is not repaired as soon as practicable, each subsequent calendar day (with the exception of situations meeting the criteria of 40 CFR 63.1294(d));

(6) For each affected source complying with 40 CFR 63.1294(c), each calendar day after 5 calendar days after detection of a leak that a first attempt at repair has not been made, and the earlier of each calendar day after 15 calendar days after detection of a leak that a leak is not repaired, or if a leak is not repaired as soon as practicable, each subsequent calendar day (with the exception of situations meeting the criteria of 40 CFR 63.1296(f)).

(c) Slabstock affected sources complying with the source-wide emission limitation. For the Permittee complying with the source-wide emission limitation as provided in 40 CFR 63.1293(b), failure to meet the requirements contained in 40 CFR 63.1299 shall be considered a violation of this subpart. Violation of each item listed in paragraph (c)(1) below, as applicable, shall be considered a separate violation.

(1) For each affected source complying with 40 CFR 63.1299 in accordance with the rolling annual compliance option in 40 CFR 63.1299(a), each calendar day in the 12-month period for which the actual HAP ABA emissions exceeded the allowable HAP ABA emissions level, each calendar day in which foam is being poured where the amount of polyol added at the mixhead is not monitored (as required) in accordance with 40 CFR 63.1303(b)(1)(i), each calendar day in a week in which the amount of HAP ABA in a storage vessel is not determined in accordance with 40 CFR 63.1303(d), each delivery of HAP ABA in which the

amount of HAP ABA added to the storage vessel is not determined in accordance with 40 CFR 63.1303(e), each calendar day in a 6-month period in which the polyol pumps are not calibrated in accordance with 40 CFR 63.1303(b)(3)(i), and each calendar day after 10 working days after production where the IFD and density of a foam grade are not determined (where required) in accordance with 40 CFR 63.1304(b);

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

D.1.10 Record Keeping Requirements [40 CFR 63.1307, Subpart III][326 IAC 20-22-1]

Pursuant to 40 CFR 63.1307, the applicable records designated in paragraphs (a) through (c) below shall be maintained by the Permittee.

(a) Storage vessel records.

(1) A list of diisocyanate storage vessels, along with a record of the type of control utilized for each storage vessel.

(2) For storage vessels complying through the use of a carbon adsorption system, the records listed in paragraphs (a)(2)(i) or (ii), and paragraph (a)(2)(iii) of this section.

(i) Records of dates and times when the carbon adsorption system is monitored for carbon breakthrough and the monitoring device reading, when the device is monitored in accordance with 40 CFR 63.1303(a); or

(ii) For affected sources monitoring at an interval no greater than 20 percent of the carbon replacement interval, in accordance with 40 CFR 63.1303(a)(2), the records listed in paragraphs (a)(2)(ii)(A) and (B) below.

(A) Records of the design analysis, including all the information listed in 40 CFR 63.1303(a)(2)(i) through (iii), and

(B) Records of dates and times when the carbon adsorption system is monitored for carbon breakthrough and the monitoring device reading.

(iii) Date when the existing carbon in the carbon adsorption system is replaced with fresh carbon.

(3) For storage vessels complying through the use of a vapor return line, paragraphs (a)(3)(i) through (iii) below.

(i) Dates and times when each unloading event occurs and each inspection of the vapor return line for leaks occurs.

(ii) Records of dates and times when a leak is detected in the vapor return line.

(iii) Records of dates and times when a leak is repaired.

(b) Equipment leak records.

(1) A list of components as specified below in paragraph (b)(1)(i).

(i) For all affected sources, a list of components in diisocyanate service,

(2) For transfer pumps in diisocyanate service, a record of the type of control utilized for each transfer pump and the date of installation.

(3) When a leak is detected as specified in 40 CFR 63.1294(b)(2)(ii) and 40 CFR 63.1294(c), the requirements listed in paragraphs (b)(3)(i) and (ii) below apply:

(i) Leaking equipment shall be identified in accordance with the requirements in paragraphs (b)(3)(i)(A) and (B) below.

(A) A readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment.

(B) The identification on equipment, other than a valve, may be removed after it has been repaired.

(ii) The information in paragraphs (b)(3)(ii)(A) through (H) shall be recorded for leaking components.

(A) The instrument and operator identification numbers and the equipment identification number.

(B) The date the leak was detected and the dates of each attempt to repair the leak.

(C) Repair methods applied in each attempt to repair the leak.

(D) The words “above leak definition" if the maximum instrument reading measured by the methods specified in 40 CFR 63.1304(a) after each repair attempt is equal or greater than the leak definitions for the specified equipment.

(E) The words “repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.

(F) The expected date of the successful repair of the leak if a leak is not repaired within 15 calendar days.

(G) The date of successful repair of the leak.

(H) The date the identification is removed.

(c) HAP ABA records.

(1) Source-wide limitations - rolling annual compliance and monthly compliance alternative records.
The Permittee complying with the source-wide limitations of 40 CFR 63.1299, and the rolling annual compliance provisions in 40 CFR 63.1299(a), shall maintain the records listed in paragraphs (c)(1)(i) through (c)(1)(vii) below.

(i) Daily records of the information listed in paragraphs (c)(1)(i)(A) through (C) of this section.

(A) A log of foam runs each day. For each run, the log shall include a list of the grades produced during the run.

(B) Results of the density and IFD testing for each grade of foam produced during each run of foam, conducted in accordance with the procedures in 40 CFR 63.1304(b). The results of this testing shall be recorded within 10 working days of the production of the foam. For grades of foam where the Permittee has designated the HAP ABA formulation limitation as zero, the Permittee is not required to keep records of the IFD and density.

(C) With the exception of those grades for which the Permittee has designated zero as the HAP ABA formulation limitation, the amount of polyol added to the slabstock foam production line at the mixhead for each grade produced during each run of foam, determined in accordance with 40 CFR 63.1303(b).

(ii) For sources complying with the source-wide emission limitation, weekly records of the storage tank level, determined in accordance with 40 CFR 63.1303(d).

(iii) Monthly records of the information listed below in paragraphs (c)(1)(iii)(A) through (E).

(A) A listing of all foam grades produced during the month,

(B) For each foam grade produced, the residual HAP formulation limitation, calculated in accordance with 40 CFR 63.1297(d).

(C) With the exception of those grades for which the Permittee has designated zero as the HAP ABA formulation limitation, the total amount of polyol used in the month for each foam grade produced.

(D) The total allowable HAP ABA and equipment cleaning emissions for the month, determined in accordance with 40 CFR 63.1297(b)(2).

(E) The total actual source-wide HAP ABA emissions for the month, determined in accordance with 40 CFR 63.1299(c)(1), along with the information listed in paragraphs (c)(1)(iii)(E)(1) and (2) below.

(1) The amounts of HAP ABA in the storage vessel at the beginning and end of the month, determined in accordance with 40 CFR 63.1299(c)(2); and

(2) The amount of each delivery of HAP ABA to the storage vessel, determined in accordance with 40 CFR 63.1299(c)(3).

(iv) Each source complying with the rolling annual compliance provisions of 40 CFR 63.1299(a) shall maintain the records listed in paragraphs (c)(1)(iv)(A) and (B) below.

(A) The sum of the total allowable HAP ABA and equipment cleaning HAP emissions for the month and the previous 11 months.

(B) The sum of the total actual HAP ABA and equipment cleaning HAP emissions for the month and the previous 11 months.

(v) Records of all calibrations for each device used to measure polyol added at the mixhead, conducted in accordance with 40 CFR 63.1303(b)(3).

(vi) Records of all calibrations for each device used to measure the amount of HAP ABA in the storage vessel, conducted in accordance with 40 CFR 63.1303(d)(1).

(vii) Records to verify that all scales used to measure the amount of HAP ABA added to the storage vessel meet the requirements of 40 CFR 63.1303(e)(3). For scales meeting the criteria of 40 CFR 63.1303(e)(3)(i), this documentation shall be in the form of written confirmation of the State or local approval. For scales complying with 40 CFR 63.1303(e)(3)(ii), this documentation shall be in the form of a report provided by the registered scale technician.

(d) The Permittee following the compliance methods in 40 CFR 63.1308(b)(1) and (c)(1) shall maintain records of each use of a vapor return line during unloading, of any leaks detected during unloading, and of repairs of leaks detected during unloading.

(e) The Permittee subject to 40 CFR 63.1300 or 40 CFR 63.1301 of this subpart shall maintain a product data sheet for each compound other than diisocyanates used to flush the mixhead and associated piping during periods of startup or maintenance, which includes the HAP content, in kg of HAP/kg solids (lb HAP/lb solids), of each solvent other than diisocyanates used to flush the mixhead and associated piping during periods of startup or maintenance.

(f) The Permittee subject to 40 CFR 63.1300 or Sec. 63.1301 of this subpart shall maintain a product data sheet for each mold release agent used that includes the HAP content, in kg of HAP/kg solids (lb HAP/lb solids), of each mold release agent.

D.1.11 Record Keeping Requirements

(a) To document compliance with Condition D.1.6, the Permittee shall maintain permanent records at the source in accordance with (1) through (3) below:

(1) The dimension of each storage vessel;

(2) An analysis showing the capacity of each storage vessel; and

(3) The true vapor pressure of each VOC stored, indicating that the maximum true vapor pressure of VOC is less than 15.0 kPa for the one (1) 30,000 gallon polyol storage tank and the one (1) 20,000 gallon No. 2 fuel oil storage tank.

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

D.1.12 Reporting Requirements [40 CFR 63.1306, Subpart III][326 IAC 20-22-1]

Pursuant to 40 CFR 63.1306, the Permittee shall comply with each applicable reporting provision in this section.

(a) Initial notification.
The Permittee shall submit an initial notification in accordance with 40 CFR 63.9(b).

(b) Application for approval of construction or reconstruction.
The Permittee shall submit an application for approval of construction or reconstruction in accordance with the provisions of 40 CFR 63.5(d).

(c) Precompliance report.
The Permittee shall submit a precompliance report no later than 12 months before the compliance date. This report shall contain the information listed in paragraphs (c)(1) through (c)(8) below, as applicable.

(1) Whether the source will comply with the emission point specific limitations described in 40 CFR 63.1293(a), or with the source-wide emission limitation described in 40 CFR 63.1293(b).

(2) For a source complying with the emission point specific limitations, whether the source will comply on a rolling annual basis in accordance with 40 CFR 63.1297(b), or will comply with the monthly alternative for compliance contained in 40 CFR 63.1297(c).

(3) For a source complying with the source-wide emission limitation, whether the source will comply on a rolling annual basis in accordance with 40 CFR 63.1299(a), or will comply with the monthly alternative for compliance contained in 40 CFR 63.1299(b).

(4) A description of how HAP ABA and/or polyol added at the mixhead will be monitored. If the owner or operator is developing an alternative monitoring program, the alternative monitoring program containing the information in 40 CFR 63.1303(b)(5)(i) through (iv) shall be submitted.

(5) Notification of the intent to use a recovery device to comply with the provisions of 40 CFR 63.1297 or 40 CFR 63.1299.

(6) For slabstock affected sources complying with 40 CFR 63.1297 or 40 CFR 63.1299 using a recovery device, the continuous recovered HAP ABA monitoring and record keeping program, developed in accordance with 40 CFR 63.1303(c).

(7) For sources complying with the source-wide emission limitation, a description of how the amount of HAP ABA in a storage vessel shall be determined.

(8) For sources complying with the source-wide emission limitation, a description of how the amount of HAP ABA added to a storage vessel during a delivery will be monitored. If the owner or operator is developing an alternative monitoring program, the alternative monitoring program containing the information in 40 CFR 63.1303(e)(4)(i) through (iv) shall be submitted.

(9) If the Administrator does not notify the owner or operator of objections to an alternative monitoring program submitted in accordance with (c)(4) or (c)(6) above, or a recovered HAP ABA monitoring and record keeping program submitted in accordance with (c)(7) above, the program shall be deemed approved 45 days after its receipt by the Administrator.

(d) Notification of compliance status.
The Permittee shall submit a notification of compliance status report no later than 180 days after the compliance date. For slabstock affected sources, this report shall contain the information listed in paragraphs (d)(1) and (2) below, as applicable. This report shall contain the information listed in paragraph (d)(3) for rebond foam processes.

(1) A list of diisocyanate storage vessels, along with a record of the type of control utilized for each storage vessel.

(2) For transfer pumps in diisocyanate service, a record of the type of control utilized for each transfer pump.

(3) A statement that the rebond foam affected source is in compliance with 40 CFR 63.1301, or that rebond processes at an affected source are in compliance with 40 CFR 63.1301.

(e) Semiannual reports.
The Permittee shall submit a report containing the information specified in paragraphs (e)(1) through (4) below semiannually no later than 60 days after the end of each 180 day period. The first report shall be submitted no later than 240 days after the date that the Notification of Compliance Status is due and shall cover the 6-month period beginning on the date that the Notification of Compliance Status Report is due.

(1) For slabstock affected sources complying with the rolling annual compliance provisions of 40 CFR 63.1299, the allowable and actual HAP ABA emissions (or allowable and actual source-wide HAP emissions) for each of the 12-month periods ending on each of the six months in the reporting period. This information is not required to be included in the initial semi-annual compliance report.

(2) For sources complying with the storage vessel provisions of 40 CFR 63.1294(a) using a carbon adsorption system, unloading events that occurred after breakthrough was detected and before the carbon was replaced.

(3) Any equipment leaks that were not repaired in accordance with 40 CFR 63.1294(b)(2)(iii) and 40 CFR 63.1294(c).

(4) Any leaks in vapor return lines that were not repaired in accordance with 40 CFR 63.1294(a)(1)(ii).

(f) Other reports.

(1) Change in selected emission limitation.
The Permittee electing to change their slabstock flexible polyurethane foam emission limitation (from emission point specific limitations to a source-wide emission limitation, or vice versa), selected in accordance with 40 CFR 63.1293, shall notify the Administrator no later than 180 days prior to the change.

(2) Change in selected compliance method.
The Permittee changing the period of compliance for 40 CFR 63.1299 (between rolling annual and monthly) shall notify the Administrator no later than 180 days prior to the change.

(g) Annual compliance certifications.
The Permittee subject to the provisions in 40 CFR 63.1293 through 63.1301 shall submit a compliance certification annually.

(1) The compliance certification shall be based on information consistent with that contained in 40 CFR 63.1308 of this section, as applicable.

(2) A compliance certification required pursuant to a State or local operating permit program may be used to satisfy the requirements of this section, provided that

the compliance certification is based on information consistent with that contained in 40 CFR 63.1308 of this section, and provided that the Administrator has approved the State or local operating permit program under part 70 of this chapter.

(3) Each compliance certification submitted pursuant to this section shall be signed by a responsible official of the company that owns or operates the affected source.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(b) one (1) natural gas flame laminator machine (ID No. FL-02), with a maximum capacity of 40,000 square feet per hour, and exhausting through two (2) stacks (ID Nos. 02-002 and FL2);

(c) one (1) thermal reticulation unit (ID No. TRU-01), constructed in 1968, processing a maximum of 10 cycles of polyurethane foam buns per hour, at a maximum volume of 244,296 cubic inches of foam per cycle, exhausting through nine (9) stacks (ID Nos. 35-43);

(d) one (1) 6 sheet felt press C (ID No. FPC), processing a maximum of 300,000 sheets per year, exhausting through one (1) stack (ID No. 48);

(e) one (1) 6 sheet felt press D (ID No. FPD), with a maximum foam processing rate of 300,000 sheets per year, exhausting through one (1) stack (ID No. 49);

(f) one (1) 6 sheet felt press E (ID FPE), with a maximum capacity to process foam at a rate of 35 sheets per hour, exhausting through one (1) stack (ID No. 51);

(h) One (1) Thermal Reticulation Unit (ID No. TRU-02), approved for construction in 2007, with a maximum throughput of 87,600 cycles per year, and exhausting through eight (8) stacks (52-59).

(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 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 flame laminator (ID No. FL-02) described in this section except when otherwise specified in 40 CFR Part 63, Subpart MMMMM.

D.2.2 Flexible Polyurethane Foam Fabrication Operations NESHAP Compliance Dates [40 CFR Part 63, Subpart MMMMM] [326 IAC 20]

There are no emission limits for the existing flame lamination affected source (FL-02). However, the source was required to submit an initial notification as required in 40 CFR 63.8816(b). The notification was to be submitted no later than 120 days after April 14, 2003.

D.2.3 Volatile Organic Compounds [326 IAC 8-1-6] [326 IAC 2-4.1-1]

(a) The laminated foam production rate for the flame laminator FL-02 shall not exceed 166,000,000 square feet per 12 consecutive month period with compliance determined at the end of each month. Emissions of VOC shall not exceed 0.0003 pound per square foot of laminated foam produced. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period. Therefore the requirements of 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) do not apply.

(b) Pursuant to the MACT determination under 326 IAC 2-4.1-1 and the BACT determination under 326 IAC 8-1-6, operating conditions for the thermal reticulation unit (TRU-02) shall be the following:

(1) Maintain the thermal reticulation unit in good working order; and

(2) Utilize quality procedures to minimize VOC emissions from this unit. The work

practices to be performed on the thermal reticulation unit include the following inspection and preventive maintenance procedures:

(a) The following preventive maintenance procedures shall be performed on the thermal reticulation unit door.
  (1) Grease chamber door gear boxes..
  (2) Grease nonpolymer door linkages. (May possibly be converted to polymer bushing.)
  (3) Lubricate shuttle table drive chains and idler bearings.
  (4) Inspect/maintain oil level in hydraulic reservoir..

(b) The following preventive maintenance procedures shall be performed on the thermal reticulation unit:
  (1) On an annual basis, remove and replace roof hydrogen and oxygen valves.
  (2) Per quality standard, replace floor level hydrogen and oxygen valves.

(c) The following inspections shall be done on the thermal reticulation unit.

  (1) Check vacuum time and adjust if necessary.
  (2) Fuel pressure check/TPM fuel fill calibration.

(d) The thermal reticulation unit Nash pump shall be lubricated.
  (1) Grease lube points per quality standard.

(e) The following preventive maintenance procedures shall be performed on the thermal reticulation unit mechanical vacuum system on a daily basis:
  (1) Drain the condensed water from the exhaust line into the bucket.
  (2) Check the oil level through the side sight glass.
  (3) Check for oil flow (sight glass with white ball).
  (4) Empty condensate bucket as needed.
  (5) Check mechanical blower oil level and add as needed.
  (6) Check the oil purifier as follows: Check gauge for proper pressure between (20-25 psi). When the purifier pressure exceeds 40 psi, service the unit.

(f) The following preventive maintenance procedures shall be performed on the Stokes pumps per preventive maintenance frequency:
  (1) Drain oil, remove side cover.
  (2) Remove baffle, remove valves.
  (3) Wipe inside of chamber to remove residue.
  (4) Install new or rebuilt valves.
  (5) Clean baffle and reinstall.
  (6) Install side cover with new gasket, if needed.
  (7) Refill with oil.
  (8) Check V -belts for wear and proper tension, replace if needed.
  (9) Check gas ballast valves, replace if needed.
  (10) Perform preventive maintenance on unit oil purifier per preventative maintenance specification.

(g) The following preventive maintenance procedures shall be performed on the mechanical blower per preventive maintenance specification:
  (1) Change air filter.
  (2) Check for water leaks.
  (3) Check V -belts.

(h) The following preventive maintenance procedures shall be performed on the chamber pressure transducer per preventive maintenance specification:
(1) Remove manometer valve.
(2) Install new or rebuilt valve.
(3) Rebuild, tag and stock valve.
(4) Check calibration of chamber pressure transducer per preventive maintenance specification.

(i) The following preventive maintenance procedures shall be performed on the shot pins per preventive maintenance frequency:
(1) Check shot pin hydraulic cylinder mount for broken or loose bolts.
(2) Check shot pin hydraulic cylinder assembly plates for torque to chamber.
(3) Check shot pin limit switch mounting bolts for tightness.

(j) The following preventive maintenance procedures shall be performed on the Nash water heat exchanger per preventive maintenance specification:
(1) Open, clean and flush all tubes.

(k) Perform fuel fill alarm preventive maintenance monthly.

(l) Perform flammable fuel detector preventive maintenance per preventive maintenance specification

(m) Perform preventive maintenance procedure on plug purge system per preventive maintenance specification:
(1) Replace the plug purge valve.
(2) Rebuild, tag and stock valve.
(3) Replace flame arrestor.
(4) Replace plug block.
(5) Clean and stock plug block.

(n) Perform thermal reticulation unit cleaning procedure dictated by production schedule:
(1) Perform clean type per schedule.
(2) Complete checklist per clean type.

(o) Perform preventive maintenance procedures on the thermal reticulation unit hydraulic system per quality control specifications:
(1) Perform oil analysis to determine replacement timing
(2) Maintain fluid level.
(3) Maintain filter.

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the facilities listed in the table below are as follows:

Emission Unit ID	Process Weight Rate, tons/hr	Allowable Particulate Emissions, lb/hr
Flame Laminator FL-02	1.0	4.1
TRU-02	5.0	12.1
Felt Press C	0.71	3.25
Felt Press D	0.71	3.25
Felt Press E	1.065	4.28

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

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

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

D.2.5 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 flame laminator (FL-02) and the thermal reticulation unit (TRU-01).

Compliance Determination Requirements

D.2.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

(a) During the period between June, 2007 and September, 2007, in order to demonstrate compliance with Conditions D.2.4 and D.2.5, the Permittee shall perform VOC testing on the flame laminator (FL-02) and PM, PM-10, and VOC testing on one (1) of the three (3) identical felt presses (FPC, FPD, or FPE) 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. PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

(b) During the period between August, 2007 and February, 2008, in order to demonstrate compliance with Condition D.2.5, the Permittee shall perform VOC and CO testing on the thermal reticulation unit (TRU-01) 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.

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

D.2.7 Record Keeping Requirements

(a) To document compliance with Condition D.2.3(a), the Permittee shall maintain a record of the total production of laminated foam per month in square feet for the flame laminator FL-02. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC production limit and the VOC emission limit established in Condition D.2.3(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(b) To document compliance with Condition D.2.3(b), the Permittee shall maintain records necessary to demonstrate compliance with BACT quality practices.

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

D.2.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(g) two (2) natural gas fired boilers (ID Nos. IPB-01 and IPB-02), each constructed in 1968, each rated at 12.6 million (MM) British thermal units (Btu) per hour, using No. 2 distillate fuel oil as back-up fuel, and each exhausting through one (1) stack (ID Nos. 45 and 46).

(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 [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (d) (Particulate Emission Limitations for Sources of Indirect Heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), PM from each of the two (2) 12.6 MMBtu per hour boilers (ID Nos. IPB-01 and IPB-02) used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input.

D.3.2 Sulfur Dioxide (SO2) [326 IAC 7-1.1-1] [326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1 (SO2 Emissions Limitations) the SO2 emissions from each of the two (2) 12.6 MMBtu per hour boilers firing No. 2 distillate fuel oil shall not exceed five tenths (0.5) pound per MMBtu heat input. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

D.3.3 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 this facility and its control device.

Compliance Determination Requirements

D.3.4 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million Btu heat input by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the two (2) 12.6 MMBtu per hour boilers (ID Nos. IPB-01 and IPB-02), using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

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

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

D.3.5 Visible Emissions Notations

(a) Visible emission notations of the two (2) 12.6 MMBtu per hour boiler stack exhausts shall be performed once per day during normal daylight operations when burning fuel oil. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal 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.

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

D.3.6 Record Keeping Requirements

(a) To document compliance with Condition D.3.2, the Permittee shall maintain records in accordance with (1) through (6) below.

(1) Calendar dates covered in the compliance determination period;

(2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

(4) Fuel supplier certifications;

(5) The name of the fuel supplier; and

(6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for

continuous monitoring instrumentation, and copies of all reports required by this permit.

(b) To document compliance with Condition D.3.5, the Permittee shall maintain records of visible emission notations of the two (2) 12.6 MMBtu per hour boiler stack exhausts once per day.

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

D.3.7 Reporting Requirements

The natural gas boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The natural gas-fired boiler certification does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.4 FACILITY OPERATION CONDITIONS

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

(a) degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (cold cleaner degreasing operation with several remote solvent reservoirs using Dynasolve CU-5 and Isosolve 2000) [326 IAC 8-3-2];

(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 6-3-2];

(c) trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone [326 IAC 6-3-2];

(d) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations [326 IAC 6-3-2];

(h) two (2) felters with VOC emissions less than 3 pounds per hour or 15 pounds per day, CO emissions less than 25 pounds per day, and PM emissions less than 5 pounds per hour or 25 pounds per day [326 IAC 6-3-2];

(i) one (1) skinner with VOC emissions less than 3 pounds per hour or 15 pounds per day, CO emissions less than 25 pounds per day, and NO_X and PM emissions less than 5 pounds per hour or 25 pounds per day [326 IAC 6-3-2];

(j) one (1) hot wire cutter with VOC emissions less than 3 pounds per hour or 15 pounds per day, CO emissions less than 25 pounds per day, and NO_X and PM emissions less than 5 pounds per hour or 25 pounds per day [326 IAC 6-3-2];

(l) bun cutters [326 IAC 6-3-2];

(m) BSR slitters [326 IAC 6-3-2];

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

Cold Cleaner Operations

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

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Process Weight Activities

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

D.4.2 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the facilities listed in the table below shall be as follows:

Facility	Process Weight Rate (tons/hr)	Emission Limit (lbs PM/hr)
Felter	0.25	1.62
Felter	0.25	1.62
Skinner	0.50	2.58
Hot Wire Cutter	0.175	1.28
Bun Cutters	0.325	1.93
BSR Slitters	0.11	0.93

The pounds per hour limitations in the table above were calculated with the following equations:

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

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

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

(1) the following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;

(2) trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;

(3) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the

following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Foamex, L.P.
Source Address: 3005 Commerical Road, Fort Wayne, Indiana 46809
Mailing Address: 3005 Commercial Road, Fort Wayne, IN 46809
Part 70 Permit No.: T003-17694-00225

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:
Phone:
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: Foamex, L.P.
Source Address: 3005 Commerical Road, Fort Wayne, Indiana 46809
Mailing Address: 3005 Commercial Road, Fort Wayne, IN 46809
Part 70 Permit No.: T003-17694-00225

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

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
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
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Foamex, L.P.
Source Address: 3005 Commercial Road, Fort Wayne, Indiana 46809
Mailing Address: 3005 Commercial Road, Fort Wayne, Indiana 46809
Part 70 Permit No.: T003-17694-00225

☐ Natural Gas Only
☐ Alternate Fuel burned
From:_____ To:_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Signature:
Printed Name:
Title/Position:
Phone:
Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

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

Part 70 Quarterly Report

Source Name: Foamex, L.P.
Source Address: 3005 Commercial Road, Fort Wayne, Indiana 46809
Mailing Address: 3005 Commercial Road, Fort Wayne, Indiana 46809
Part 70 Permit No.: T003-17694-00225
Facility: Flame Laminator (FL-02)
Parameter: VOC emissions
Limit: The laminated foam production rate for the flame laminator FL-02 shall not exceed 166,000,000 square feet per 12 consecutive month period with compliance determined at the end of each month. Emissions of VOC shall not exceed 0.0003 pound per square foot of laminated foam produced. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	Laminated Foam Production This Month (square feet)	Laminated Foam Production Previous 11 Months (square feet)	12 Month Total Laminated Foam Production (square feet)
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Foamex, L.P.
Source Address: 3005 Commercial Road, Fort Wayne, Indiana 46809
Mailing Address: 3005 Commercial Road, Fort Wayne, Indiana 46809
Part 70 Permit No.: T003-17694-00225

Months: _____ to _ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Source/Permit Modification

Source Description and Location

Source Name:	Foamex, LP
Source Location:	3005 Commercial Road, Fort Wayne, Indiana 46809
County:	Allen
SIC Code:	3086
Operating Permit Renewal No.:	T003-17694-00225
Operating Permit Renewal Issuance Date:	October 14, 2004
Significant Source Modification No.:	003-25183-00225
Significant Permit Modification No.:	003-25210-00225
Permit Reviewer:	Jamal Naas

The office of Air Quality (OAQ) has reviewed a Part 70 significant source modification and significant permit modification application from Foamex, LP relating to the installation and operation of a new thermal reticulation unit and two (2) felt presses.

Existing Approvals

The source was issued a Part 70 Operating Permit Renewal on October 14, 2004. The source has since received the following approvals:

(a) Administrative Amendment No. 003-25178-00225**,** issued on September 25, 2007.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM_{10}	attainment
$PM_{2.5}$	attainment
SO_2	attainment
NO_2	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

Note: On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to redesignate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph counties as attainment for the 8-hour ozone standard.

(a) 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.

(b) Volatile organic compounds (VOC) and nitrogen oxides (NO_X) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to ozone. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Allen County has been classified as attainment for $PM_{2.5}$. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for $PM_{2.5}$ emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for $PM_{2.5}$ emissions, it has directed states to regulate PM_{10} emissions as a surrogate for $PM_{2.5}$ emissions.

(d) Allen County has been classified as attainment or unclassifiable for PM_{10}, SO_2, NO_2, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(e) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Nonattainment NSR 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	Emissions (tons/year)
PM	4.30
PM_{10}	5.33
SO_2	55.98
VOC	216.8
CO	102.80
NO_x	17.84

(a) This existing source is a minor stationary source, under PSD (326 IAC 2-2), because all regulated pollutants are emitted at a rate of less than 250 tons per year, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

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 (ton/yr)
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 2006 OAQ emission data.

Pollutant	**Actual Emissions** (ton/yr)
PM	Not reported
PM_{10}	0.00
SO_2	0.00
VOC	54.00
CO	55.00
NO_X	1.00
Single HAP	Not reported
Total HAPs	Not reported

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Foamex, LP on August 28, 2007, relating to the construction and operation of the following new emissions units:

(a) One (1) Thermal Reticulation Unit, identified as TRU-02, approved for construction in 2007, with a maximum capacity of 87,600 cycles per year, and exhausting through eight (8) stacks (52 through 59);

(b) Two Insignificant Activities:

(1) One (1) two-sheet felt press, identified as FPA; and

(2) One (1) six-sheet felt press, identified as FPF.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Stack Summary

Stack/Vent ID	**Operation**	**Height** (ft)	**Diameter** (ft)	**Flow Rate** (acfm)	**Temperature** (^{0}F)
52	Thermal Reticulation Unit (TRU-02)	20.0	4.5	10,500	125
53		20.0	4.5	10,500	125
54		22.5	0.33	169	150
*55		23.0	0.25	-	150
56		26.5	0.25	1,300	150
57		25.5	0.25	1,300	150
58		50.0	0.25	500	150
59		24.5	1.00	2,500	225

* Pressure relief vent

Emission Calculations

See Appendix A of this Technical Support 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."

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	**Potential To Emit** (ton/yr)
PM	0.46
PM_{10}	0.46
SO_2	0.00
VOC	40.05
CO	92.00
NO_X	0.00

HAPs	**Potential To Emit** (ton/yr)
Single HAP (Benzene)	16.5
TOTAL HAPs	21.4

This source modification is subject to 326 IAC 2-7-10.5(f)(4)(D) & (6), because the modification has a potential to emit greater than or equal to twenty-five (25) tons per year of Volatile Organic Compounds (VOCs), greater than or equal to twenty-five (25) tons per year for combination of HAPs, and greater than or equal to ten (10) tons per year for a single HAP.

Additionally, the source modification will be incorporated into the Part 70 Operating Permit Renewal through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1), because the modification does not qualify as a minor permit modification or an administrative amendment. The modification includes a significant change to monitoring, reporting and recordkeeping. In addition, the modification requires a case-by-case determination of an emission limit.

Permit Level Determination – PSD

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

	Potential to Emit (ton/yr)					
Process / Emission Unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**
Thermal Reticulation Unit (RTU-02)	------	------	------	39.42	92.0	------
Two (2) Felt Presses	0.46	0.46	------	0.63	-------	-------
Total for Modification	0.46	0.46	0.0	40.05	92.0	0.0
Major Source Threshold	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emissions increase is less than the PSD major source threshold. Therefore, pursuant to 326 IAC 2-2, the

PSD requirements do not apply. However, after this modification the source will be a major source under PSD.

	Potential to Emit (ton/yr)
Process	**VOC**
Entire Source Before Modification	216.8
Modification	40.05
Entire Source After Modification	256.95
Major Source Threshold	250

Deleted: 95

Federal Rule Applicability Determination

The following federal rules are applicable to the source due to this modification:

(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 and 40 CFR Part 61) applicable to this modification.

(c) The proposed thermal reticulation unit is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 20 and 40 CFR Part 63, Subpart lll - Flexible Polyurethane Foam Production). The provisions of this subpart apply to each new and existing flexible polyurethane foam or rebond foam process that meets the following criteria:

(1) produces flexible polyurethane or rebond foam;

(2) emits a HAP, except as provided in 40 CFR 63.1290(c)(2);

(3) is located at a plant site that is a major source, as defined in 40 CFR 63.2.

A process meeting one of the following criteria shall not be subject to the provisions of 40 CFR 63.1290:

(1) a process exclusively dedicated to the fabrication of flexible polyurethane foam;

(2) a research and development process; or

(3) a slabstock flexible polyurethane foam process at a plant site where the total amount of HAP, excluding diisocyanate reactants, used for slabstock foam production and foam fabrication is less than or equal to five (5) tons per year.

The proposed thermal reticulation unit is a process exclusively dedicated to the fabrication of flexible polyurethane foam, therefore it is not subject to the provisions of 40 CFR 63.1290.

(d) 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 Part 70 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:

CAM Applicability Analysis							
Emission Unit	**Control Device Used**	**Emission Limitation** (Y/N)	**Uncontrolled PTE** (ton/yr)	**Controlled PTE** (ton/yr)	**Part 70 Major Source Threshold** (ton/yr)	**CAM Applicable** (Y/N)	**Large Unit** (Y/N)
Thermal Reticulation Unit (TRU-02) - VOC	N	N	39.42	39.42	100	N	N
Thermal Reticulation Unit (TRU-02) - CO	N	N	92.0	92.0	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the new units as part of this modification.

State Rule Applicability Determination

The following state rules are applicable to the source due to this modification:

326 IAC 2-2 (PSD)
This modification to an existing stationary source is not major because the emissions increase is less than the PSD major source threshold. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. However, after the issuance of this permit, source-wide VOC PTE will make the source major for PSD.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)
The proposed thermal reticulation unit, identified as TRU-02 is subject to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), since its potential VOC emissions are greater than 25 tons per year. This rule requires that the Permittee reduce VOC emissions using Best Available Control Technology (BACT). See BACT analysis in Appendix B.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)
Pursuant to 326 IAC 2-4.1-1, any new process or production unit, which has the potential to emit 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, must be controlled using technologies consistent with the Maximum Achievable Control Technologies (MACT). Foamex, LP has performed a Case-by-Case MACT review for the thermal reticulation unit, researching State and Federal regulatory agency web sites and databases, trade associations as well as internal Foamex business resources, and found that there are only two thermal reticulation units operating in the United States with add-on controls. The two units, operating at Crest Foam Industries in Moonachie, New Jersey, operate with add-on scrubber technology that only controls HCN emissions. The scrubbers have a control efficiency of 53% and result in HCN emissions of 2.8 and 2.32 tons per year from the two units.. There have been no state or federal control technology determinations to limit HAPs. Therefore, the BACT determination in Appendix B will also serve as MACT.

Compliance Determination and Monitoring Requirements

There are no new compliance determination requirements as a result of this modification.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T003-17694-00225. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

(1) The table of contents has been updated to reflect all of the changes.

(2) All references to IDEM, OAQ's mailing address have been revised as follows:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue~~, P. O. Box 6015~~
MC 61-53 IGCN 1003
Indianapolis, Indiana 4620~~64-6015~~**2251**

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue~~, P. O. Box 6015~~
MC 61-53 IGCN 1003
Indianapolis, Indiana 4620~~46~~-**2251**~~6015~~

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue**, P. O. Box 6015**
MC 61-53 IGCN 1003
Indianapolis, Indiana 4620~~46~~-**2251**~~6015~~

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue~~, P. O. Box 6015~~
MC 61-52 IGCN 1003
Indianapolis, Indiana 4620~~46~~-**2251**~~6015~~

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue~~, P. O. Box 6015~~
MC 61-50 IGCN 1003
Indianapolis, Indiana 4620~~46~~-**2251**~~6015~~

(3) To clarify the permit term and the term of the conditions, original Conditions B.2 - Permit Term and B.16 - Permit Renewal now B.17 have been modified. Additionally, new Section B conditions, B.3 - Term of Conditions and B.13 - Prior Permits Superseded have been added.

(4) IDEM has rearranged the permit conditions such that original Condition B.4 - Termination of Right to Operate is now Condition B.14.

(5) Instructions for the original Condition B.9 - Annual Compliance Certification (ACC) have been revised. The emission statement reporting requirements changed. The submission date for the ACC will continue to depend on which County the source is located.

(6) IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request records of preventive

maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of original Condition B.10 - Preventive Maintenance Plan and has amended original Condition B.11 - Emergency Provisions.

(7) For clarification purposes, Condition B.19 - Operational Flexibility now B.20 has been revised.

(8) Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule became effective on March 16, 2005; therefore, the condition reflecting this rule will be incorporated into the permit as condition B.26 - Credible Evidence.

(9) 326 IAC 6-1 has been recodified. The rule provisions were incorporated into two articles, 326 IAC 6.5 and 326 IAC 6.8. All non-Lake County PM limitations, formerly listed in 326 IAC 6-1, have been moved to 326 IAC 6.8. The new articles were published in September 1, 2005 Indiana Register and 326 IAC 6-1 has been repealed. Therefore, original Condition C.1 - Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour which referenced 326 IAC 6-1 have been modified to reflect these changes.

(10) IDEM has reconsidered the requirement to develop and follow a Compliance Monitoring Plan (original Condition C.15). 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. Therefore, original Condition C.15 for the "Compliance Monitoring Plan" has been replaced by Condition C.15 for the "Response to Excursions or Exceedances".

(11) Section A and Section D changes are shown and discussed after the Section B and Section C changes. Section B and Section C changes referenced above are shown below:

~~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)] [326 IAC 2-1.1-9.5]~~

~~This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, 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 Provide Information [326 IAC 2-7-5(6)(E)]~~

~~(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "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.~~

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

~~B.8 Certification [326 IAC 2-7-4(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.9 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. All 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 Branch, Office of Air Quality~~
~~100 North Senate Avenue, P. O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

~~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.10 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 maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:~~

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

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

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

~~(b) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance 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 is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

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

~~B.11 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.~~

~~(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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: 317-233-5674 (ask for Compliance Section)~~
~~Facsimile Number: 317-233-5967~~

~~(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, P. O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

~~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)(9) 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) 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.~~

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

~~B.12 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 in 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) 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.~~

~~(c) 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.~~

~~(d) 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.~~

~~(e) 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).~~

~~(f) 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)]~~

~~(g) 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)(8)]~~

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

~~(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either~~

~~(1) incorporated as originally stated,~~

~~(2) revised, or~~

~~(3) deleted~~

~~by this permit.~~

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

~~B.14 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, P.O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

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

~~The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "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.~~

~~B.15 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.16 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, P.O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

~~(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.17 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, P.O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

~~Any such application shall 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)]~~

~~(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.~~

~~B.18 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) 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.19 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, P. O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

~~and~~

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

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

~~(5) The Permittee maintains records on-site 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)(1), (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 is not considered an application form, report or compliance certification. Therefore, the notification 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.20 Source Modification Requirement [326 IAC 2-7-10.5]~~

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

~~B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]~~

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

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

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

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

~~B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]~~

~~(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, P.O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

~~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.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]~~

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

~~(b) 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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.~~

~~B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]~~

~~Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.~~

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)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

(a) This permit, T003-17694-00225, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

B.4 Enforceability [326 IAC 2-7-7]

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.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 Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "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.

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

B.8 Certification [326 IAC 2-7-4(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 the "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. One (1) certification may cover multiple forms in one (1) submittal.

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

B.9 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 no later than July 1 of each year to:

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

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.10 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 extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.11 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.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) 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) 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.

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

B.12 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) 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.

(c) 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.

(d) 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.

(e) 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).

(f) 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)]

(g) 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)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T003-17694-00225 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 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.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. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "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.

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 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(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 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(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) A timely renewal application is one that is:

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

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

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

B.18 Permit Amendment or 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 shall 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) 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 limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

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

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (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 is not considered an application form, report or compliance certification. Therefore, the notification 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 emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(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.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

A modification, construction, or reconstruction is governed by the requirements of 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][IC 13-30-3-1][IC 13-17-3-2]

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

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

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

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

B.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)][326 IAC 2-1.1-7]

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

(b) 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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

(a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.26 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 Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]~~

~~(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

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

~~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.~~

~~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).~~

~~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 unit(s) 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 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (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, P.O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

~~The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "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 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~

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

~~(g) Indiana Accredited Asbestos Inspector~~
~~The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not 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, P. O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

~~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 Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.~~

~~Compliance Requirements [326 IAC 2-1.1-11]~~

~~C.10 Compliance Requirements [326 IAC 2-1.1-11]~~

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

~~Compliance Monitoring Requirements [326 IAC 2-7-5(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 thirty (30) 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 thirty (30) days, the Permittee may extend the compliance schedule related to the equipment for an additional thirty (30) days provided the Permittee notifies:~~

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

~~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 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]~~

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

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

~~C.13 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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on June 18, 1999.~~

~~(b) 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.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]~~

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

~~C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]~~

~~(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:~~

~~(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.~~

~~(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~

~~(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 as follows:~~

~~(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or~~

~~(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~

~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~

~~(4) Failure to take reasonable response steps shall be considered a deviation from the permit.~~

~~(c) The Permittee is not required to take any further response steps for any of the following reasons:~~

~~(1) A false reading occurs due to the malfunction of the monitoring equipment and 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 a minor permit modification 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) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the~~

~~Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~

~~(e) The Permittee shall record all instances when, in accordance with Section D, response steps are 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.~~

~~(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~

~~C.16 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 response action documents submitted pursuant to this condition do 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.17 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) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:~~

~~(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);~~

~~(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.~~

~~The statement must be submitted to:~~

~~Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

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

~~(b) The 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.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]~~

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

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

~~C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]~~

~~(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "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, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~

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

~~(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(e) Reporting periods are based on calendar years.~~

~~Stratospheric Ozone Protection~~

~~C.20 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 C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 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.

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 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 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by 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 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

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

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos

Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by 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 Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.10 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.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(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.13 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
MC 61-53 IGCN 1003
100 North Senate Avenue
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.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.15 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 (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][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 twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

The response action documents submitted pursuant to this condition do require the certification by the "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.17 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) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(3) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The 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).

(b) The 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.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

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

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

(c) If there is a "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) affecting an existing emissions unit, other than 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/or 326 IAC 2-3-1 (z)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:

(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) 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/or 326 IAC 2-3-1(mm)(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.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "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, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "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, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

(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) and/or 326 IAC 2-3-1 (ll)) 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) and/or 326 IAC 2-3-1 (qq), 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) and/or 326 IAC 2-3-2(c)(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 46204-2251

(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.20 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.

(12) Section A.1 is being revised to change the minor PSD source status to a major PSD source status. After this modification the source will be a major source under PSD. The potential VOC emissions from the entire source will be greater than 250 tons per year.

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 polyurethane foam production and foam processing plant.

Source Status:	Part 70 Operating Permit Program ~~Minor~~ **Major** Source, under PSD Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

(13) The new thermal reticulation unit is being added to Section A.2 as follows:

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:

(h) One (1) thermal reticulation unit (ID No. TRU-02), approved for construction in 2007, with a maximum throughput of 87,600 cycles per year, exhausting through eight (8) stacks (ID Nos. 52-59).

(14) The new two (2) felt presses have been added in A.3 Section as insignificant activities as follows:

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):

(n) one (1) 20,000 gallon No. 2 fuel oil storage tank with VOC emissions less than 3 pounds per hour or 15 pounds per day [326 IAC 12]; ~~and~~

(o) two (2) 6,000 gallon methylene chloride storage tanks [40 CFR 63, Subpart III]~~.~~**; and**

(p) Two (2) felt presses, identified as FPA and FPF with VOC emissions less than 3 pounds per hour or 15 pounds per day, CO emissions less than 25 pounds per day, and PM emissions less than 5 pounds per hour or 25 pounds per day [326 IAC 6-3-2].

(15) Section D.2 is being revised to include the new thermal reticulation unit as follows:

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(b) one (1) natural gas flame laminator machine (ID No. FL-02), with a maximum capacity of 40,000 square feet per hour, and exhausting through two (2) stacks (ID Nos. 02-002 and FL2);

(c) one (1) thermal reticulation unit (ID No. TRU-01), constructed in 1968, processing a maximum of 10 cycles of polyurethane foam buns per hour, at a maximum volume of 244,296 cubic inches of foam per cycle, exhausting through nine (9) stacks (ID Nos. 35-43);

(d) one (1) 6 sheet felt press C (ID No. FPC), processing a maximum of 300,000 sheets per year, exhausting through one (1) stack (ID No. 48);

(e) one (1) 6 sheet felt press D (ID No. FPD), with a maximum foam processing rate of 300,000 sheets per year, exhausting through one (1) stack (ID No. 49);

(f) one (1) 6 sheet felt press E (ID FPE), with a maximum capacity to process foam at a rate of 35 sheets per hour, exhausting through one (1) stack (ID No. 51);

(h) One (1) Thermal Reticulation Unit (ID No. TRU-02), approved for construction in 2007, with a maximum throughput of 87,600 cycles per year, and exhausting through eight (8) stacks (52-59).

(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.2.3 Volatile Organic Compounds [326 IAC 8-1-6] **[326 IAC 2-4.1-1]**

(a) The laminated foam production rate for the flame laminator FL-02 shall not exceed 166,000,000 square feet per 12 consecutive month period with compliance determined at the end of each month. Emissions of VOC shall not exceed 0.0003 pound per square foot of laminated foam produced. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period. Therefore the requirements of 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) do not apply.

(b) Pursuant to the MACT determination under 326 IAC 2-4.1-1 and the BACT determination under 326 IAC 8-1-6, operating conditions for the thermal reticulation unit (TRU-02) shall be the following:

(1) Maintain the thermal reticulation unit in good working order; and

(2) Utilize quality procedures to minimize VOC emissions from this unit. The work practices to be performed on the thermal reticulation unit include the following inspection and preventive maintenance procedures:

(a) The following preventive maintenance procedures shall be performed on the thermal reticulation unit door.
- **(1) Grease chamber door gear boxes..**
- **(2) Grease nonpolymer door linkages. (May possibly be converted to polymer bushing.)**
- **(3) Lubricate shuttle table drive chains and idler bearings.**
- **(4) Inspect/maintain oil level in hydraulic reservoir..**

(b) The following preventive maintenance procedures shall be performed on the thermal reticulation unit:
- **(1) On an annual basis, remove and replace roof hydrogen and oxygen valves.**
- **(2) Per quality standard, replace floor level hydrogen and oxygen valves.**

(c) The following inspections shall be done on the thermal reticulation unit.
- **(1) Check vacuum time and adjust if necessary.**
- **(2) Fuel pressure check/TPM fuel fill calibration.**

(d) The thermal reticulation unit Nash pump shall be lubricated.
- **(1) Grease lube points per quality standard.**

(e) The following preventive maintenance procedures shall be performed on the thermal reticulation unit mechanical vacuum system on a daily basis:
- **(1) Drain the condensed water from the exhaust line into the bucket.**
- **(2) Check the oil level through the side sight glass.**
- **(3) Check for oil flow (sight glass with white ball).**
- **(4) Empty condensate bucket as needed.**
- **(5) Check mechanical blower oil level and add as needed.**
- **(6) Check the oil purifier as follows: Check gauge for proper pressure between (20-25 psi). When the purifier pressure exceeds 40 psi, service the unit.**

(f) The following preventive maintenance procedures shall be performed on the Stokes pumps per preventive maintenance frequency:
- **(1) Drain oil, remove side cover.**
- **(2) Remove baffle, remove valves.**
- **(3) Wipe inside of chamber to remove residue.**
- **(4) Install new or rebuilt valves.**
- **(5) Clean baffle and reinstall.**
- **(6) Install side cover with new gasket, if needed.**
- **(7) Refill with oil.**
- **(8) Check V -belts for wear and proper tension, replace if needed.**
- **(9) Check gas ballast valves, replace if needed.**
- **(10) Perform preventive maintenance on unit oil purifier per preventative maintenance specification.**

(g) The following preventive maintenance procedures shall be performed on the mechanical blower per preventive maintenance specification:
(1) Change air filter.
(2) Check for water leaks.
(3) Check V -belts.

(h) The following preventive maintenance procedures shall be performed on the chamber pressure transducer per preventive maintenance specification:
(1) Remove manometer valve.
(2) Install new or rebuilt valve.
(3) Rebuild, tag and stock valve.
(4) Check calibration of chamber pressure transducer per preventive maintenance specification.

(i) The following preventive maintenance procedures shall be performed on the shot pins per preventive maintenance frequency:
(1) Check shot pin hydraulic cylinder mount for broken or loose bolts.
(2) Check shot pin hydraulic cylinder assembly plates for torque to chamber.
(3) Check shot pin limit switch mounting bolts for tightness.

(j) The following preventive maintenance procedures shall be performed on the Nash water heat exchanger per preventive maintenance specification:
(1) Open, clean and flush all tubes.

(k) Perform fuel fill alarm preventive maintenance monthly.

(l) Perform flammable fuel detector preventive maintenance per preventive maintenance specification

(m) Perform preventive maintenance procedure on plug purge system per preventive maintenance specification:
(1) Replace the plug purge valve.
(2) Rebuild, tag and stock valve.
(3) Replace flame arrestor.
(4) Replace plug block.
(5) Clean and stock plug block.

(n) Perform thermal reticulation unit cleaning procedure dictated by production schedule:
(1) Perform clean type per schedule.
(2) Complete checklist per clean type.

(o) Perform preventive maintenance procedures on the thermal reticulation unit hydraulic system per quality control specifications:
(1) Perform oil analysis to determine replacement timing
(2) Maintain fluid level.
(3) Maintain filter.

D.2.~~6~~**4** Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the facilities listed in the table below are as follows:

Emission Unit ID	Process Weight Rate, tons/hr	Allowable Particulate Emissions, lb/hr
Flame Laminator FL-02	1.0	4.1
TRU-02	**5.0**	**12.1**
Felt Press C	0.71	3.25
Felt Press D	0.71	3.25
Felt Press E	1.065	4.28

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

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

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

(16) Upon further review, IDEM has determined that Conditions D.2.4 and D.2.5 ca be removed. These Conditions are more generally covered by the Source Modification Requirement under Condition B.21. Subsequent condition numbers have been revised. Record Keeping Requirements for these limits under Condition D.2.7 (formerly Condition D.2.9) and the associated quarterly reporting forms have been removed from the permit.

~~D.2.4 Volatile Organic Compounds (VOCs) and Carbon Monoxide (CO) [326 IAC 2-7-10.5]~~

~~Any change or modification which may increase the potential to emit VOC or CO from the thermal reticulation unit (ID No. TRU-01) to greater than exempt levels, as specified in 326 IAC 2-1.1-3, based on stack test emission factors of 0.9 pound of VOC per cycle and 2.1 pounds of CO per cycle, shall be subject to the source modification requirements pursuant to 326 IAC 2-7-10.5 and must be approved by the Office of Air Quality (OAQ) before such change can occur.~~

~~D.2.5 Volatile Organic Compounds (VOCs) [326 IAC 2-7-10.5]~~

~~Any change or modification which may increase the potential to emit VOC, PM and PM-10 from any of the three (3) felt presses (ID Nos. FPC, FPD, and FPE) to greater than exempt levels, as specified in 326 IAC 2-1.1-3, based on the stack test results, shall be subject to the source modification requirements pursuant to 326 IAC 2-7-10.5 and must be approved by the Office of Air Quality (OAQ) before such change can occur.~~

D.2.7~~9~~ Record Keeping Requirements

(a) To document compliance with Condition D.2.3**(a)**, the Permittee shall maintain a record of the total production of laminated foam per month in square feet for the flame laminator FL-02. Records maintained shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC production limit and the VOC emission limit established in Condition D.2.3**(a)**. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(b) To document compliance with Condition D.2.3(b), the Permittee shall maintain records necessary to demonstrate compliance with BACT work practices.

~~(b) To document compliance with Condition D.2.4, the Permittee shall maintain records in accordance with (1) through (3) below for the thermal reticulation unit (TRU-01). Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with Condition D.2.4.~~

~~(1) The number of cycles and the volume of foam per cycle;~~

~~(2) A log of the dates of use; and~~

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~~(3) The weight of VOCs and CO emitted for each compliance period.~~

~~(c) To document compliance with Condition D.2.5, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with Condition D.2.5. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.~~

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~~(1) The number of polyurethane sheets processed;~~

~~(2) The weight of the polyurethane foam processed;~~

~~(3) A log of the dates of use; and~~

~~(4) The weight of VOCs emitted for each compliance period.~~

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

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(17) Upon further review, 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 condition requiring control device inspection has been removed from the permit. In addition, the requirement to keep records of the inspections has been removed.

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D.1.11 Record Keeping Requirements

~~(b) To document compliance with Condition D.1.7, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

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

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D.2.~~9~~**7** Record Keeping Requirements

~~(d) To document compliance with Condition D.2.7, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

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

D.3.6 Record Keeping Requirements

~~(c) To document compliance with Condition D.2.7, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

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

(18) Upon further review, IDEM has determined that once per day visible emission notations and once per day monitoring of the control device is generally sufficient to ensure proper operation of the emission units and control devices. Therefore, the monitoring frequency in Conditions D.3.5 and D.3.6 has been changed from once per shift to once per day as follows:

Deleted: *17*

D.3.5 Visible Emissions Notations

(a) Visible emission notations of the two (2) 12.6 MMBtu per hour boiler stack exhausts shall be performed once per ~~shift~~ **day** during normal daylight operations ~~when exhausting to the atmosphere~~ when burning fuel oil. 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 abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation Records and Reports shall be considered a deviation from this permit.~~

(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.3.6 Record Keeping Requirements

(b) To document compliance with Condition D.3.5, the Permittee shall maintain records of visible emission notations of the two (2) 12.6 MMBtu per hour boiler stack exhausts once per ~~shift~~ **day when combusting No. 2 fuel oil. If a visible emissions notation is not taken while combusting No. 2 fuel oil, a record of why this record was not taken shall be provided**.

Conclusion and Recommendation

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 003-25183-00225 and Significant Permit Modification No. 003-25210-00225, respectively . The staff recommend to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

Deleted: *(18) Upon further review, IDEM has determined that Conditions D.2.4 and D.2.5 be removed. These Conditions are more generally covered by the Source Modification Requirement under Condition B.21. Subsequent condition numbers have been revised.*¶
.¶
~~D.2.4 Volatile Organic Compounds (VOCs) and Carbon Monoxide (CO) [326 IAC 2-7-10.5]~~¶
~~Any change or modification which may increase the potential to emit VOC or CO from the thermal reticulation unit (ID No. TRU-01) to greater than exempt levels, as specified in 326 IAC 2-1.1-3, based on stack test emission factors of 0.9 pound of VOC per cycle and 2.1 pounds of CO per cycle, shall be subject to the source modification requirements pursuant to 326 IAC 2-7-10.5 and must be approved by the Office of Air Quality (OAQ) before such change can occur.~~ ¶
¶
~~D.2.5 Volatile Organic Compounds (VOCs) [326 IAC 2-7-10.5]~~¶
~~Any change or modification which may increase the potential to emit VOC, PM and PM-10 from any of the three (3) felt presses (ID Nos. FPC, FPD, and FPE) to greater than exempt levels, as specified in 326 IAC 2-1.1-3, based on the stack test results, shall be subject to the source modification requirements pursuant to 326 IAC 2-7-10.5 and must be approved by the Office of Air Quality (OAQ) before such change can occur.~~
¶
¶

Appendix A: Emission Calculations

Company Name: Foamex, L.P.
Company Address: 3005 Commercial Road, Fort Wayne, Indiana 46809
SPM: 003-25210-00225
SSM: 003-25183-00225
Permit Reviewer: Jamal Naas
Date: November 2, 2007

Total Potential To Emit (tons/year)				
Emissions Generating Activity				
Pollutant	Thermal Reticulation* TRU-02	2-Sheet Felt Press** FPA	6-Sheet Felt Press** FPF	**TOTAL**
PM	0.00	0.09	0.35	0.4
PM10	0.00	0.09	0.35	0.4
SO2	0.00	0.00	0.00	0.0
NOx	0.00	0.00	0.00	0.0
VOC	39.42***	0.32	0.31	40.1
CO	92***	0.00	0.00	92.0
total HAPs	21.37	0.00	0.00	21.4
worst case single HAP	(Benzene) 16.49	0.00	0.00	

Total emissions based on rated capacities at 8,760 hours/year.

*Potential emissions based on August 2002 IDEM witnessed, site specific stack test results for a similar unit (TRU-01) at Fort Wayne Foamex plant.

Maximum of 87,600 cycles of polyurethane foam buns/year.

**Potential emissions based on June 2002 IDEM witnessed, site specific stack tests performed on similar equipment at the Foamex Fort Wayne plant.

FPA: 0.073 lbs VOC/hr * 24 Hrs/day * 365 days/yr * 1 ton/2000lbs = 0.32 TPY

FPF: 0.070 lbs VOC/hr * 24 Hrs/day * 365 days/yr * 1 ton/2000lbs = 0.31TPY

***Based on Emission Factor of 0.9 lbs/cycle for VOC and 2.1 lbs/cycle for CO and annual operation of 87,600 cycles/year.

Appendix B

VOC CONTROL TECHNOLOGY / STATE BACT ANALYSIS for the POLYURETHANE FOAM THERMAL RETICULATION UNIT

Foamex, LP

Source Background and Description

Source Location:	**3005 Commercial Road, Fort Wayne, Indiana 46809**
County:	**Allen**
SIC Code:	**3086**
SSM No.:	**003-25183-00225**
Permit Reviewer:	**Jamal Naas**

Foamex, LP submitted a permit application to install a thermal reticulation unit at the Fort Wayne foam manufacturing and processing facility. The thermal reticulation unit uses thermal energy to destroy the cell membrane of the polyurethane foam. The process places a foam slab into the chamber. The chamber is then drawn to a vacuum and at a vacuum pressure, the fuel mixture (stoichometric mixture of oxygen and hydrogen gas) is charged into the chamber. The chamber is charged with a blanket of inert gas (nitrogen) which covers the foam slab that now contains the fuel mixture internally. An ignition source ignites the mixture, which causes a wave of elevated temperature and pressure to traverse through the foam slab. The chamber is then flooded with an inert gas and restored to atmospheric pressure. The foam is removed to a cooling hood next to the chamber for further cooling and out-gassing.

The proposed thermal reticulation unit will have the potential to generate VOC emissions based on the type and quantity of foam processed. The estimated uncontrolled VOC emission rate is provided in the table below:

Emission Unit	Emission Unit Identification No.	Uncontrolled VOC Emissions (TPY)
Thermal Reticulation Unit	TRU-02	39.42

Associated with this unit are eight (8) stacks that exhaust air from individual process zones associated with this unit. The total exhaust gas volume is approximately 30,000 acfm. The VOC emission rate and exhaust gas volume were used in the BACT evaluation.

The following BACT analysis is an evaluation of VOC BACT for the thermal reticulation unit, identified as TRU-02 using the “Top Down BACT Guidance” published by the U.S. EPA, Office of Air Quality Planning and Standards, March 15, 1990.

Several sources were consulted regarding similar operations and associated controls implemented. These sources include the U.S. EPA RACT/BACT/LAER Clearinghouse database for process type (99.016 - Polyurethane Foam Products Manufacturing) and (99.014 - Polystyrene Foam Products Manufacturing), recent permit applications, USEPA, air permitting authorities, and equipment vendors.

BACT Definition and Applicability

Federal guidance on BACT requires an evaluation that follows a “top down” process. In this approach, the applicant identifies the best-controlled similar source on the basis of controls required by the regulation or the permit, or the controls achieved in practice. The highest level of the control is then evaluated for technical feasibility.

The five basic steps of a top-down BACT analysis are listed below:

Step 1: Identify Potential Control Technologies

The first step is to identify potentially “available” control options for each emission unit and for each pollutant under review. Available options should consist of a comprehensive list of those technologies with a potentially practical application to the emissions unit in question. The list should include lowest achievable emission rate (LAER) technologies, innovative technologies and controls applied to similar source categories.

Step 2: Eliminate Technically Infeasible Options

The second step is to eliminate technically infeasible options from further consideration. To be considered feasible, a technology must be both available and applicable. It is important in this step that any presentation of a technical argument for eliminating a technology from further consideration be clearly documented based on physical, chemical, engineering and source-specific factors related to safe and successful use of the controls.

Step 3: Rank The Remaining Control Technologies By Control Effectiveness

The third step is to rank the technologies not eliminated in Step 2 in order of descending control effectiveness for each pollutant of concern. If the highest ranked technology is proposed as BACT, it is not necessary to perform any further technical or economic evaluation, except for the environmental analyses.

Step 4: Evaluate The Most Effective Controls And Document The Results

The fourth step entails an evaluation of energy, environmental, and economic impacts for determining a final level of control. The evaluation begins with the most stringent control option and continues until a technology under consideration cannot be eliminated based on adverse energy, environmental, or economic impacts.

Step 5: Select BACT

The fifth and final step is to select as BACT the most effective of the remaining technologies under consideration for each pollutant of concern. BACT must, at a minimum, be no less stringent than the level of control required by any applicable New Source Performance Standard (NSPS) and National Emissions Standard for Hazardous Air Pollutants (NESHAP) or state regulatory standards applicable to the emission units included in the permits.

BACT for Volatile Organic Compound (VOC)

Several sources were consulted regarding similar operations and the associated controls implemented. This search revealed that no information was available in the RBLC database or readily available recent permit applications for similar facilities.

Step 1 – Identify Control Options

The following control technologies were identified and evaluated to control VOC emissions from the thermal reticulation unit:

(a) Condensation System

(b) Carbon Adsorption

(c) Absorption Control of VOC Gas Streams

(d) Polyad™ System

(e) Flare

(f) Biofiltration

(g) Membrane Separation Technology

(h) Ultraviolet (UV) Oxidation

(i) Non-Thermal Plasma (NTP) Technology

(j) Catalytic Incineration

(k) Thermal Oxidation

Step 2 – Eliminate Technically Infeasible Control Options

The test for technical feasibility of any control option is whether it is both available and applicable to reducing VOC emissions from the thermal reticulating unit. The previously listed information resources were consulted to determine the extent of applicability of each identified control alternative.

(a) Condensation System - These systems utilize a refrigerant to cool the exhaust stream, effect a phase change from gas to liquid for a target volatile constituent with ascertainable phase change conditions, collect the liquid, and thereby lower the concentration in the gas phase. However, this technology is only effective under high concentration gradients in excess of 100 ppmv. The exhaust streams associated with the thermal reticulation unit are very dilute which would preclude any effective technical applicability of a condensation system. Condensation systems are therefore eliminated from further consideration in this BACT analysis because of technical infeasibility.

(b) Carbon Adsorption - Activated carbon beds have a track record of successful application for adsorbing specific VOC emissions. However, the application of the technology is subject to certain limitations which can negate its applicability for specific organic streams. Whenever an exhaust stream contains other contaminants such as particulates and moisture, the technology loses its efficiency. The presence of moisture and particulates in the stream will require significant gas pre-conditioning since these interferences are harmful to the efficiency of the carbon bed. In effect, they induce a masking phenomenon reducing the available adsorption surface area.

In addition, very dilute exhaust streams would significantly impair the effective technical applicability of a carbon adsorption system which starts to collapse at inlet VOC concentrations less than approximately 50 ppmv. The desorption cycle would involve re-entrainment of the VOCs unless they were further controlled by some form of an oxidization

scheme.

In conclusion, carbon adsorption technology is not considered technically feasible to reduce VOC emissions from the thermal reticulation unit for the reasons noted above. Carbon adsorption is therefore eliminated from further consideration due to technical infeasibility in this BACT analysis.

(c) Absorption Control of VOC Gas Streams - Absorption is widely used as a raw material and/or product recovery technique in separation and purification of gaseous streams containing high concentrations of VOC, especially water-soluble compounds such as methanol, ethanol, isopropanol, butanol, acetone, and formaldehyde. However, as an emission control technique, it is much more commonly employed for controlling inorganic gases than for VOC. When using absorption as the primary control technique for organic vapors, the spent solvent must be easily regenerated or disposed of in an environmentally acceptable manner.

This technology has been determined to be infeasible for the thermal reticulation unit due to the variation in VOC that may be present in the unit's gas stream, the variability of the VOC concentration in the gas stream, as well as the low relative solubility of the gas stream. Absorption control has therefore been eliminated from further consideration in this BACT analysis.

(d) Polyad™ System - This is an innovative system offered by a microwave technology vendor combining resin fluidized bed adsorption with microwave dynamic bed desorption that claims VOC control primarily for stripping VOCs from SVE (soil vapor extraction) units, air stripping at remediation sites, and solvent recovery. There are significant reservations regarding its technical applicability. Any adsorption system would suffer from limitations, as those summarized below:

1) Impaired efficiency due to dilute inlet stream concentrations as discussed earlier;

2) Effect of interferences such as particulates, moisture and the presence of certain constituents which are particularly harmful as discussed earlier;

3) Re-entrainment of VOCs during microwave desorption; and

4) Microwave desorption technology is not a proven technology for application in the foam manufacturing and processing industry.

In conclusion, the Polyad™ adsorption/microwave desorption technology is not considered technically feasible to reduce VOC emissions from the thermal reticulation unit and will be eliminated from further consideration in this BACT analysis.

(e) Flare - Flares are commonly used in industry to safely combust VOC and volatile HAPs. Flares are used extensively to dispose of (1) purged and wasted products from refineries, (2) unrecoverable gases emerging with oil from oil wells, (3) vented gases from blast furnaces, (4) unused gases from coke ovens, and (5) gaseous wastes from chemical industries. Flares are also used for burning waste gases generated by sewage digesters, coal gasification, rocket engine testing, nuclear power plants with sodium/water heat exchangers, heavy water plants, and ammonia fertilizer plants.

Foamex, LP does not qualify as any of these industries. This technology has been determined to be infeasible for the thermal reticulation unit due to the large amount of fuel that would be needed to combust the low VOC concentration/high air volume waste stream and will be eliminated from further consideration in this BACT analysis.

(f) Biofiltration – This is an air pollution control technology in which off-gases containing biodegradable organic compounds are vented, under controlled temperature and humidity, through a biologically active material. The microorganisms contained in the bed of compost-like material digest or biodegrade the organic to CO2 and water. This technology has been largely utilized for control of odorous emissions with a clearly speciated air stream. The process of biofilteration utilizes a biofilm containing a population of microorganisms immobilized on a porous substrate such as peat, soil, sand, wood, compost, or numerous synthetic media. As an air stream passes through the biofilter, the contaminants in the air stream partition from the air phases to the liquid phase of the biofilm. Once the contaminants pass into the liquid phase, they become bioavailable for complex oxidative process by the microorganisms inhabiting the biofilm.

The bioscrubber is an enhancement of the biotrickling filter whereby a packed tower is flooded with a liquid-phase and the discharge effluent is retained in a sump for added time to improve the microbe contact time. The advantages of a bioscrubber are as follows - no gas conditioning or humidification required, smaller footprint than other reactors, process suitable for neutralizing acids formed in-situ during treatment, and lesser interference from particulates. The disadvantages of a biofiltration system include complex feeding and neutralizing systems and the handling of toxic chemicals to control biomass growth.

Most bioreactors have large footprints, are maintenance intensive, operate in narrow bands of temperature and pressure requiring expensive gas conditioning, and have primarily been used for odor control in clearly speciated air streams. Because of the size of a biofiltration system, existing space at the plant would not be available to support this type of system.

In conclusion, due to the above operational and space limitations, the technology is not considered technically feasible to reduce VOC emissions from the thermal reticulation unit and will be eliminated from further consideration in this BACT analysis.

(g) Membrane Separation Technology – This organic vapor/air separation technology involves the preferential transport of organic vapors through a non-porous gas separation membrane via a diffusion process analogous to pumping saline water through a reverse osmosis membrane. In this system, the feed stream is compressed to approximately 150 psig and sent to a condenser where the liquid solvent is recovered. The condenser bleed stream is sent to the membrane module comprised of spirally-wound modules of thin film membranes separated by plastic mesh spacers. The concentrated stream from the membrane module is returned to the compressor for further recovery in the condenser. There is no known application of membrane separation technology for thermal reticulation units.

In conclusion, since there is no known application of this technology for a thermal reticulation unit, this technology is not considered technically feasible to reduce VOC emissions from this process and will be eliminated from further consideration in this BACT analysis.

(h) Ultraviolet (UV) Oxidation – UV light oxidation (or photolytic destruction) of vapor-phase contaminants is accomplished by passing the off-gas in close proximity to a powerful UV light source. Oxidation occurs as a result of reactions with hydroxyl radicals produced by the UV light. The photo-oxidation usually is supplemented by a gaseous chemical oxidant (i.e., ozone) or a solid catalyst (e.g., TiO2). The process is best used to treat easily oxidized organic compounds, such as those with double bonds (e.g., trichloroethylene, perchloroethylene and vinyl chloride) as well as simple aromatic compounds (e.g., toluene, benzene, xylene, and phenol).

Initially, this technology emerged as a biocidal technology for water treatment since bacteria are destroyed at a wavelength of 254 nanometers. Additionally, it was recognized

that the technology was also useful in cleaving and ionizing certain organics so that they are easily removed by deionization and organic scavenging cartridges in a polishing loop. This technology has been proposed for off-gas treatment from SVE and other groundwater remediation units by the DOE. For thermal reticulation units, this technology suffers from the following effective technical applicability reservations:

(1) UV light frequency must be selected for maximum VOC removal based on inlet stream VOC species and concentrations. Questionable effectiveness for a matrix of volatile constituents with variable photolytic destruction isotherms, interaction between chemical constituents, preferential destruction and premature breakthroughs or non-oxidizable species;

(2) Pretreatment of inlet gas required to minimize ongoing cleaning and maintenance of UV reactor and quartz sleeves;

(3) Potential fouling of solid TiO2 catalyst by interferences such as particulates, moisture and long-chain organics;

(4) Prohibitive energy requirements to power the UV reactor in excess of competing technologies; and

(5) Extensive maintenance and calibration requirements.

In conclusion, due to the above technical applicability reservations, this technology is not considered technically feasible to reduce VOC emissions from the thermal reticulation unit and will be eliminated from further consideration in this BACT analysis.

(i) Non-Thermal Plasma (NTP) Technology – NTP technology was developed by the Los Alamos National Lab for the DOD and DOE as part of a new generation of VOC control options. The intent of the research was to develop a low-cost solution with reduced energy and power requirements for controlling a host of air contaminants including VOCs. An NTP is an electrically neutral form of gas containing substantial concentrations of electrons, ions and other highly reactive free radicals which may be generated in the gas stream by application of electrical energy. In theory, the sequential chemical reactions result in the destruction of the air contaminants. Other research organizations such as Batelle have developed NTP variants such as the Gas Phase Corona Reactor (GPCR) which creates non-thermal plasma in a reactor filled with dielectric packing which significantly improves reactor performance.

The U.S. Navy sought to be one of the first to install NTP technology for controlling paint booth VOC emissions. However, at this time, the technology is not "off-the shelf" and not widely commercially available in the United States.

In conclusion, on account of the above lack of commercial availability and proven track record in controlling VOC emissions, this technology is not considered technically feasible to reduce VOC emissions from the thermal reticulation unit and will be eliminated from further consideration in the BACT analysis.

(j) Catalytic Incineration – Catalytic incinerators are control devices in which the solvent laden air is preheated and the organic HAPs are ignited and combusted to carbon dioxide and water. In the presence of a catalyst this reaction will take place at lower temperatures than those required for thermal oxidation. Temperatures between 350 and 500 degrees Celsius are common. The catalysts are metal oxides or precious metals where they are supported on ceramic or metallic substrates. Catalytic incinerators can achieve control device efficiencies of 95 to 99 percent.

From an operational standpoint, the lower reaction temperature means that the requirement for supplemental fuel is reduced or eliminated during normal operation. The lower operating temperatures will also decrease the formation of oxides of nitrogen.

There are two types of catalytic incinerators available: fluid-bed and fixed-bed. The fluid-bed unit is appropriate for units with flow rates between 2,000 and 50,000 scfm. This type of control would not be feasible for the reticulation unit since the flow rate will be approximately 30,000 acfm. The fixed-bed incinerator is appropriate for units with flow rates between 2,000 and 50,000 scfm. However, the low VOC concentration loading in the thermal reticulation unit makes catalytic incineration questionable when trying to achieve higher VOC destruction efficiencies (i.e., >95%). The incorporation of a catalytic incinerator is not considered to be technically feasible because of the following reasons:

(1) Potential contamination of the catalyst; and

(2) The requirement to collect the spent catalyst for regeneration requires additional involvement of staff personnel.

(3) The low VOC concentration, high air flow, and catalyst contact time involved.

In conclusion, because of technical and cost issues stated above, the use of catalytic incineration to control VOC emissions from the thermal reticulation unit has been eliminated from further consideration in this BACT analysis. Thermal incineration is a more technically feasible control method for this application than catalytic incineration and is discussed in the following section.

(k) Thermal Oxidation – Thermal oxidizers are control devices in which the solvent laden air is preheated and the organic HAPs are ignited and combusted to carbon dioxide and water. Dilute gas streams require auxiliary fuel (generally natural gas) to sustain combustion. Various incinerator designs are used by different manufacturers. The combustion chamber designs must provide high turbulence to mix the fuel and solvent laden air. The other requirement is enough residence time to ensure essentially complete combustion. Thermal oxidizers can be operated to achieve a wide range of control device efficiencies. Efficiencies of 95% are possible.

In conclusion, the use of thermal oxidation to control VOC emissions from the thermal reticulation unit has been deemed to be technically feasible. The economic, energy and environmental impacts associated with this technology are further discussed in this BACT analysis. The use of thermal oxidation to control VOC emissions from the thermal reticulation unit is technically feasible and considered the top level of control for reducing VOC emissions.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

As shown in Steps 1 and 2, the only remaining viable control technology for the thermal reticulation unit is thermal oxidation. This type of technology has been shown to be effective at reducing VOC emissions and can be considered the top alternative for controlling VOC emissions from the thermal reticulation unit.

Step 4 – Evaluate the Most Effective Controls and Document Results

As shown in the previous steps, the most effective control technology or top alternative for controlling VOC emissions from the thermal reticulation unit is as follows:

Emission Source	Top Level of Control	Further Evaluation Required
Thermal Reticulation Unit	Thermal Oxidation	Yes

Further evaluation per EPA's top-down approach is required, including economic, energy and environmental impacts as required for controlling VOC emissions from the thermal reticulation unit.

Step 5 – Select BACT

A review of USEPA's RACT/BACT/LAER Clearinghouse, Indiana air permits and sources permitted by other states agencies, identified the following previous BACT determinations with respect to polyurethane foam products manufacturing process:

Thermal Reticulation Unit					
Plant/ Facility Description	**RBLC ID or Permit #**	**Date Issued and State**	**Emission Unit**	**VOC Control Technology/VOC Emissions Limit**	**Basis of Limit or Control**
Proposed: Foamex, LP Polyurethane Foam Manufacturing	SSM No. 003-25183-00225	Proposed (Indiana)	Thermal Reticulation Unit	Maintain unit in good working order. Utilize best management work practices to minimize VOC emissions.	State BACT
Foamex, LP	SSM No. 003-12873-00225	7/3/2001 (Indiana)	Thermal Reticulation Unit	Maintain unit in good working order. Utilize best management work practices to minimize VOC emissions.	State BACT

IDEM, OAQ, searched the RBLC database under Polyurethane Foam Products Manufacturing as well as under Polystyrene Foam Products Manufacturing. These processes were not found in the RBLC database.

Although no similar sources or sources with similar operations were identified as using any type of add-on control device, Foamex, LP explored using a recuperative thermal oxidation system (RTO) with 95% destruction efficiency. The following cost analysis was based on OAQPS Cost Manual:

Table 1

Estimated Capital and Operating Costs [Recuperative Thermal Oxidation System (with 70% Heat Recovery) for 95% Control of VOC from Thermal Reticulation Unit (TRU-02).		
CAPITAL COSTS		
Direct Capital Costs (DC)		
	Gas Flow:	30,000 acfm
	Purchased Equipment Costs (PE)	
	Recuperative Thermal Oxidation System (OAQPS Budgetary Pricing)	
	Incinerator system with 95% regenerative heat exchanger, housing and frame, inlet and exhaust ductwork.	$280,877
	Instrumentation (10% of Equipment, OAQPS Manual)	$28,000
	Access Way Addition (Engr. Estimate)	$25,000
	Sales Taxes (6% of Equipment)	$19,000
	Freight (5% of Equipment)	$15,000
	Total Purchased Equipment Cost (PE)	**$368,000**
	Direct Installation Costs (DI)	
	Foundations & Supports (0.08 PE)	$29,000

Table 1

Estimated Capital and Operating Costs [Recuperative Thermal Oxidation System (with 70% Heat Recovery) for 95% Control of VOC from Thermal Reticulation Unit (TRU-02).		
CAPITAL COSTS		
	Erection & Handling (0.14 PE)	$52,000
	Electrical (0.04 PE)	$15,000
	Piping (0.02 PE)	$7,000
	Insulation + Painting (0.02 PE)	$7,000
	Site Preparation , etc.	$30,000
	Total Direct Installation Costs	**$140,000**
	Total Direct Costs (DC)	**$508,000**
Indirect Capital Costs (IC)		
Engineering & Supervision (0.1PE)		$37,000
Construction & Field Expenses (0.05 PE)		$18,000
Contractor Fees (0.10 PE)		$37,000
Start Up + Performance Costs (0.03 PE)		$11,000
Overall Contingencies (0.03 PE)		$11,000
	IC Total	$114,000
	Total Capital Investment (TCI) = Sum (DC + IC) =	$622,000
	Capital Recovery at 7% interest over 10 years (0.14238*TCI)	$88,560
Operation and Maintenance (O & M)		
Direct ANNUAL COSTS (DA)		
Direct Operating Costs		
Operating Labor		
Operator (1 hr/day, 365 days/yr, $20/hr) + Supervisor (15% of Operator)		$8,000
Maintenance		
Labor (1hr/day, 365 days/yr, $20/hr) + Materials (100% of Labor)		$15,000
Natural Gas Requirement (0.0018 scfm gas/acfm exhaust air flow @ $12.85/1000 ft3)		$365,000
Electricity (0.003705 kW/acfm flow for 8760 hrs/yr @ $0.057/kW-hr)		$41,000
	Total Direct Annualized Costs (DA)	**$429,000**
Indirect Annual Costs (IA)		
Overhead (60% of maintenance parts and labor costs		$14,000
Admin., Property Tax, Insurance (4% of TCI)		$25,000
	Indirect Annual Total	$39,000
	O & M Total	**$468,000**
	Total Annual Capital and O & M Costs (including Capital Recovery)	**$556,560**
Baseline VOC Emissions from the Thermal Reticulation Unit (TRU-02) (tpy)		39.42
Annual VOC removal assuming 95% Removal Efficiency (tons)		37.45
	Cost Effectiveness,$/Ton VOC Removed	**$14,900**

Note: - Cost Factors are based on OAQPS Control Cost Manual (Ch. 3, 5th Ed., Dec 1995)

BACT Conclusion:

Pursuant to 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the Thermal Reticulation Unit, identified as TRU-02 shall be the following:

(1) Maintain the thermal reticulation unit in good working order; and

(2) Utilize quality procedures to minimize VOC emissions from this unit. The work practices to be performed on the thermal reticulation unit include the following inspection and preventive maintenance procedures:

(a) The following preventive maintenance procedures shall be performed on the thermal reticulation unit door.
- (1) Grease chamber door gear boxes.
- (2) Grease nonpolymer door linkages. (May possibly be converted to polymer bushing.)
- (3) Lubricate shuttle table drive chains and idler bearings.
- (4) Inspect/maintain oil level in hydraulic reservoir.

(b) The following preventive maintenance procedures shall be performed on the thermal reticulation unit:
- (1) On an annual basis, remove and replace roof hydrogen and oxygen valves.
- (2) Per quality standard, replace floor level hydrogen and oxygen valves.

(c) The following inspections shall be done on the thermal reticulation unit.
- (1) Check vacuum time and adjust if necessary.
- (2) Fuel pressure check/TPM fuel fill calibration.

(d) The thermal reticulation unit Nash pump shall be lubricated.
- (1) Grease lube points per quality standard.

(e) The following preventive maintenance procedures shall be performed on the thermal reticulation unit mechanical vacuum system on a daily basis:
- (1) Drain the condensed water from the exhaust line into the bucket.
- (2) Check the oil level through the side sight glass.
- (3) Check for oil flow (sight glass with white ball).
- (4) Empty condensate bucket as needed.
- (5) Check mechanical blower oil level and add as needed.
- (6) Check the oil purifier as follows: Check gauge for proper pressure between (20-25 psi). When the purifier pressure exceeds 40 psi, service the unit.

(f) The following preventive maintenance procedures shall be performed on the Stokes pumps per preventive maintenance frequency:
- (1) Drain oil, remove side cover.
- (2) Remove baffle, remove valves.
- (3) Wipe inside of chamber to remove residue.
- (4) Install new or rebuilt valves.
- (5) Clean baffle and reinstall.

(6) Install side cover with new gasket, if needed.
(7) Refill with oil.
(8) Check V -belts for wear and proper tension, replace if needed.
(9) Check gas ballast valves, replace if needed.
(10) Perform preventive maintenance on unit oil purifier per preventative maintenance specification.

(g) The following preventive maintenance procedures shall be performed on the mechanical blower per preventive maintenance specification:
(1) Change air filter.
(2) Check for water leaks.
(3) Check V -belts.

(h) The following preventive maintenance procedures shall be performed on the chamber pressure transducer per preventive maintenance specification:
(1) Remove manometer valve.
(2) Install new or rebuilt valve.
(3) Rebuild, tag and stock valve.
(4) Check calibration of chamber pressure transducer per preventive maintenance specification.

(i) The following preventive maintenance procedures shall be performed on the shot pins per preventive maintenance frequency:
(1) Check shot pin hydraulic cylinder mount for broken or loose bolts.
(2) Check shot pin hydraulic cylinder assembly plates for torque to chamber.
(3) Check shot pin limit switch mounting bolts for tightness.

(j) The following preventive maintenance procedures shall be performed on the Nash water heat exchanger per preventive maintenance specification:
(1) Open, clean and flush all tubes.

(k) Perform fuel fill alarm preventive maintenance monthly.

(l) Perform flammable fuel detector preventive maintenance per preventive maintenance specification

(m) Perform preventive maintenance procedure on plug purge system per preventive maintenance specification:
(1) Replace the plug purge valve.
(2) Rebuild, tag and stock valve.
(3) Replace flame arrestor.
(4) Replace plug block.
(5) Clean and stock plug block.

(n) Perform thermal reticulation unit cleaning procedure dictated by production schedule:
(1) Perform clean type per schedule.
(2) Complete checklist per clean type.

(o) Perform preventive maintenance procedures on the thermal reticulation unit hydraulic system per quality control specifications:

(1) Perform oil analysis to determine replacement timing
(2) Maintain fluid level.
(3) Maintain filter.