



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: August 25, 2008

RE: UGN, Inc. / 127-25941-00072

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

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

UGN, Inc.
2252 Industrial Drive
Valparaiso, Indiana 46383

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

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M127-25941-00072	
Issued by: <i>Original document signed by</i> Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 25, 2008 Expiration Date: August 25, 2018

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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

Source Address:	2252 Industrial Drive, Valparaiso, Indiana 46383
Mailing Address:	2252 Industrial Drive, Valparaiso, Indiana 46383
General Source Phone Number:	(219) 531-4428
SIC Code:	3714
County Location:	Porter
Source Location Status:	Nonattainment for 8-hour ozone standard Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Six (6) molding cells (identified as Cell # 1 through 6), consisting of thirty-five (35) injection mold carriers, with a total production of 9,930 pounds of molded polyurethane foam insulation per hour. The stacks on Cell #3 have an exhaust rate of 8,500 acfm each. All other stacks have a flow rate of 5,000 acfm. This facility was constructed in 1996.
- (b) One (1) headliner adhesive spray line booth (identified as HL-1), using two (2) airless spray guns, capable of spraying both sides of 60 headliners per hour. This facility was constructed in 1997.
- (c) Two (2) 11,000-gallon bulk organic chemical storage tanks, constructed in 1997.
- (d) Two (2) 6,000-gallon bulk organic chemical storage tanks, constructed in 1997.
- (e) One (1) cold cleaner degreaser with a storage capacity of 20 gallons and maximum solvent consumption of one (1) gallon per day, used for degreasing operation and located in the maintenance department. This unit was installed in January, 1997.
- (f) Plant wide use of cleanup solvents and mold release agents delivered from aerosol cans, manual spray bottles, or air atomization spray guns, solvent pumped to and from closed container to another to flush adhesive delivery lines and use of the parts washer.
- (g) Eleven (11) roof air-makeup units burning natural gas, with a combined heat input capacity of 26.90 MMBtu/hr. These units were installed in 1997.
- (h) Fifteen (15) various natural gas-fired heaters, with a combined heat input capacity of 3.64 MMBtu/hr. These units were installed in 1996.

- (i) One (1) mudguard operation (identified as cell #9), constructed in 2003, using polyethylene terephthalate (PET) and latex padding with a maximum process rate of 360 pounds per hour.
- (j) Two (2) cold cleaner degreasers with a combined storage capacity of 115 gallons and maximum solvent consumption of one (1) gallon per day, used for degreasing operations. These units were constructed in 2003.
- (k) One (1) adhesive spray booth, identified as PVC-2, constructed in 2004, with a maximum throughput rate of 100 fibrous pads per hour, using airless spray guns, and controlled by dry filters.
- (l) One (1) clean-up operation for tool and equipment, constructed in 2004, using aerosol spray cans.
- (m) Four (4) hot molding presses (identified as HMP-1,2,3, and 4), constructed in 2004, each with a maximum throughput rate of 236 pounds of padding and fabric per hour, and using a water-based mold release agent, sprayed intermittently onto the mold surface to prevent sticking.
- (n) One (1) Ultralite Cell, identified as UL-1, constructed in 2005, with a maximum throughput rate of 840 pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-1-B and C-1-D, respectively, and to hood systems C-1-A and C-1-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.
- (o) One (1) Ultralite Cell, identified as UL-2, constructed in 2005, with a maximum throughput rate of 840 pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-2-B and C-2-D, respectively, and to hood systems C-2-A and C-2-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.
- (p) One (1) Ultralite Cell, identified as UL-3, constructed in 2006, with a maximum throughput rate of 840 pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-3-B and C-3-D, respectively, and to hood systems C-3-A and C-3-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.
- (q) One (1) Ultralite Cell, identified as UL-4, constructed in 2006, with a maximum throughput rate of 840 pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-4-B and C-4-D, respectively, and to hood systems C-4-A and C-4-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.
- (r) One (1) mudguard operation (identified as cell #15), constructed in 2007, using polyethylene terephthalate (PET) and latex padding with a maximum process rate of 360 pounds per hour.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M127-25941-00072, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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

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

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

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain

certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 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, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M127-25941-00072 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(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 ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least ninety (90) days 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 2-6.1 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.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

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

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.15 Source Modification Requirement

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.16 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.18 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.19 Credible Evidence [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 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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

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

C.7 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.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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 2-6.1-5(a)(2)]

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

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

C.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.

C.13 Instrument Specifications [326 IAC 2-1.1-11]

- (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

C.14 Response to Excursions or Exceedances

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.

- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

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

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.16 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.17 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: polyurethane foam composite part/plastic headliner operation

- (a) Six (6) molding cells (identified as Cell # 1 through 6), consisting of thirty-five (35) injection mold carriers, with a total production of 9,930 pounds of molded polyurethane foam insulation per hour. The stacks on Cell #3 have an exhaust rate of 8,500 acfm each. All other stacks have a flow rate of 5,000 acfm. This facility was constructed in 1996.
- (b) One (1) headliner adhesive spray line booth (identified as HL-1), using two (2) airless spray guns, capable of spraying both sides of 60 headliners per hour. This facility was constructed in 1997.
- (c) Two (2) 11,000-gallon bulk organic chemical storage tanks, constructed in 1997.
- (d) Two (2) 6,000-gallon bulk organic chemical storage tanks, constructed in 1997.
- (e) One (1) cold cleaner degreaser with a storage capacity of 20 gallons and maximum solvent consumption of one (1) gallon per day, used for degreasing operation and located in the maintenance department. This unit was installed in January, 1997.
- (j) Two (2) cold cleaner degreasers with a combined storage capacity of 115 gallons and maximum solvent consumption of one (1) gallon per day, used for degreasing operations. These units will be constructed in 2003.
- (k) One (1) adhesive spray booth, identified as PVC-2, constructed in 2004, with a maximum throughput rate of 100 fibrous pads per hour, using airless spray guns, and controlled by dry filters.
- (m) Four (4) hot molding presses (identified as HMP-1,2,3, and 4), constructed in 2004, each with a maximum throughput rate of 236 pounds of padding and fabric per hour, and using a water-based mold release agent, sprayed intermittently onto the mold surface to prevent sticking.
- (n) One (1) Ultralite Cell, identified as UL-1, constructed in 2005, with a maximum throughput rate of 840 pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-1-B and C-1-D, respectively, and to hood systems C-1-A and C-1-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.
- (o) One (1) Ultralite Cell, identified as UL-2, constructed in 2005, with a maximum throughput rate of 840 pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-2-B and C-2-D, respectively, and to hood systems C-2-A and C-2-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.
- (p) One (1) Ultralite Cell, identified as UL-3, constructed in 2006, with a maximum throughput rate of 840 pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-3-B and C-3-D, respectively, and to hood systems C-3-A and C-3-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.

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

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the one (1) headliner spray booth line (HL-1) and the one (1) adhesive spray booth (PVC-2) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.2 Volatile Organic Compounds [326 IAC 8-3-2] [326 IAC 8-3-5][326 IAC 8-3-8]

The degreasing operation, identified as the parts washer and the three (3) cold tank cleaners, shall comply with the following requirements:

- (a) Pursuant to 326 IAC 8-3-2, the owner or operator shall:
- (1) Equip the cleaner with a cover;
 - (2) Equip the cleaner with a facility for draining cleaned parts;
 - (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label summarizing the operation requirements; and
 - (6) 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.
- (b) Pursuant to 326 IAC 8-3-5(a), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

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

intended to be used to clean electronic components, shall ensure that the following operating requirements are met:

- (1) On and after November 1, 1999, no person shall do the following:
 - (A) Cause or allow the sale of solvents for use in cold cleaning degreasing operations with a vapor pressure that exceeds two (2) millimeters of mercury (thirty-eight thousandths (0.038) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit) in an amount greater than five (5) gallons during any seven (7) consecutive days to an individual or business.
 - (B) Operate a cold cleaning degreaser with a solvent vapor pressure that exceeds two (2) millimeters of mercury (thirty-eight thousandths (0.038) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (2) On and after May 1, 2001, no person shall do the following:
 - (A) Cause or allow the sale of solvents for use in cold cleaning degreasing operations with a vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit) in an amount greater than five (5) gallons during any seven (7) consecutive days to an individual or business.
 - (B) Operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (3) On and after November 1, 1999, the following record keeping requirements shall be followed:
 - (A) All persons subject to (d)(1)(A) and (d)(2)(A) above shall maintain all of the following records for each sale:
 - (i) The name and address of the solvent purchaser.
 - (ii) The date of sale.
 - (iii) The type of solvent.
 - (iv) The volume of each unit of solvent sold.
 - (v) The total volume of the solvent.
 - (vi) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
 - (B) All persons subject to the requirements of subsection (d)(1)(B) and (d)(2)(B) above shall maintain each of the following records for each purchase:
 - (i) The name and address of the solvent supplier.
 - (ii) The date of purchase.
 - (iii) The type of solvent.
 - (iv) The volume of each unit of solvent.
 - (v) The total volume of the solvent.

- (vi) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (4) All records required by subsection (3) above shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

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

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-9-1]

Pursuant to 326 IAC 8-9 (Volatile Organic Storage Vessels), the owner or operator shall maintain a record and submit to the department a report containing the following information for the two (2) six-thousand (6,000) gallon and the two (2) eleven-thousand (11,000) bulk volatile organic storage tanks:

- (1) The vessel identification;
- (2) The vessel dimensions;
- (3) The vessel capacity; and
- (4) A description of the emission control equipment for each vessel, as described in section 4(a) and 4(b) of this rule, or a schedule for installation of emission control equipment on vessels described in section 4(a) and 4(b) of this rule with a certification that the emission control equipment meets the applicable standard.

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

**MINOR SOURCE OPERATING PERMIT (MSOP)
CERTIFICATION**

Source Name: UGN, Inc.
Source Address: 2252 Industrial Drive, Valparaiso, Indiana 46383
Mailing Address: 2252 Industrial Drive, Valparaiso, Indiana 46383
MSOP No.: M127-25941-00072

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 Notification

Test Result (specify) _____

Report (specify) _____

Notification (specify) _____

Affidavit (specify) _____

Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	UGN, Inc.
Address:	2252 Industrial Drive
City:	Valparaiso, Indiana 46383
Phone #:	(219) 531-4428
MSOP #:	M127-25941-00072

I hereby certify that UGN, Inc. is :

still in operation.

I hereby certify that UGN, Inc. is :

no longer in operation.

in compliance with the requirements of MSOP M127-25941-00072.

not in compliance with the requirements of MSOP M127-25941-00072.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	UGN, Inc.
Source Location:	2252 Industrial Drive
County:	Porter
SIC Code:	3714
Permit Renewal No.:	M127- 25941- 00072
Permit Reviewer:	Donald McQuigg

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from UGN, Inc. relating to the operation of a stationary automotive polyurethane foam composite part/plastic headliner manufacturing plant.

History

On January 22, 2008, UGN, Inc. submitted an application to the OAQ requesting to renew its operating permit. UGN, Inc. was issued a New Source Construction Permit and its first MSOP M127-16516-00072 on April 22, 2003.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Six (6) molding cells (identified as Cell # 1 through 6), consisting of thirty-five (35) injection mold carriers, with a total production of 9,930 pounds of molded polyurethane foam insulation per hour. The stacks on Cell #3 have an exhaust rate of 8,500 acfm each. All other stacks have a flow rate of 5,000 acfm. This facility was constructed in 1996.
- (b) One (1) headliner adhesive spray line booth (identified as HL-1), using two (2) airless spray guns, capable of spraying both sides of 60 headliners per hour. This facility was constructed in 1997.
- (c) Two (2) 11,000-gallon bulk organic chemical storage tanks, constructed in 1997.
- (d) Two (2) 6,000-gallon bulk organic chemical storage tanks, constructed in 1997.
- (e) One (1) cold cleaner degreaser with a storage capacity of 20 gallons and maximum solvent consumption of one (1) gallon per day, used for degreasing operation and located in the maintenance department. This unit was installed in January 1997.
- (f) Plant wide use of cleanup solvents and mold release agents delivered from aerosol cans, manual spray bottles, or air atomization spray guns, solvent pumped to and from closed container to another to flush adhesive delivery lines and use of the parts washer.
- (g) Eleven (11) roof air-makeup units burning natural gas, with a combined heat input capacity of 26.90 MMBtu/hr. These units were installed in 1997.
- (h) Fifteen (15) various natural gas-fired heaters, with a combined heat input capacity of 3.64 MMBtu/hr. These units were installed in 1996.

- (i) One (1) mudguard operation (identified as cell #9), constructed in 2003, using polyethylene terephthalate (PET) and latex padding with a maximum process rate of 360 pounds per hour.
- (j) Two (2) cold cleaner degreasers with a combined storage capacity of 115 gallons and maximum solvent consumption of one (1) gallon per day, used for degreasing operations. These units were constructed in 2003.
- (k) One (1) adhesive spray booth, identified as PVC-2, constructed in 2004, with a maximum throughput capacity of 100 fibrous pads per hour, using airless spray guns, and controlled by dry filters.
- (l) One (1) clean-up operation for tool and equipment, constructed in 2004, using aerosol spray cans.
- (m) Four (4) hot molding presses (identified as HMP-1,2,3, and 4), constructed in 2004, each with a maximum throughput capacity of 236 pounds of padding and fabric per hour, and using a water-based mold release agent, sprayed intermittently onto the mold surface to prevent sticking.
- (n) One (1) Ultralite Cell, identified as UL-1, constructed in 2005, with a maximum throughput capacity of 840 pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-1-B and C-1-D, respectively, and to hood systems C-1-A and C-1-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.
- (o) One (1) Ultralite Cell, identified as UL-2, constructed in 2005, with a maximum throughput capacity of 840 pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-2-B and C-2-D, respectively, and to hood systems C-2-A and C-2-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.
- (p) One (1) Ultralite Cell, identified as UL-3, constructed in 2006, with a maximum throughput capacity of 840 pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-3-B and C-3-D, respectively, and to hood systems C-3-A and C-3-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.
- (q) One (1) Ultralite Cell, identified as UL-4, constructed in 2006, with a maximum throughput capacity of 840 pounds of padding per hour, equipped with two (2) natural gas-fired curing ovens, each rated at 2.4 MMBtu per hour, with each oven exhausting to vents C-4-B and C-4-D, respectively, and to hood systems C-4-A and C-4-C, a robotic hot melt adhesive applicator utilizing non-VOC containing adhesive, mold presses, and a trim press.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

- (a) One (1) mudguard operation (identified as cell #15), constructed in 2007, using polyethylene terephthalate (PET) and latex padding with a maximum process rate of 360 pounds per hour.

Emission Units and Pollution Control Equipment Removed From the Source

- (a) One (1) molding cell (identified as Cell # 7), consisting of seven (7) injection mold carriers, with a total production of 2,551 pounds of molded polyurethane foam insulation per hour.
- (b) One (1) adhesive spray booth, identified as PVC-1, constructed in 2004, with a maximum throughput capacity of 100 fibrous pads per hour, using airless spray guns, and controlled by dry filters.
- (c) One (1) headliner adhesive spray line booth (identified as HL-2), using two (2) airless spray guns robotic stations, capable of spraying 120 headliners per hour, using seventy-five (75) pounds of adhesive per hour. This facility was constructed in 1997.

Existing Approvals

Since the issuance of MSOP M127-16516-00072 on April 22, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) Notice-Only Change No. 127-18606-00072 issued on March 30, 2004;
- (b) Minor Permit Revision No. 127-20418-00072 issued on January 11, 2005;
- (c) Minor Permit Revision No. 127-21099-00072 issued on May 11, 2005; and
- (d) Notice-Only Change No. 127-23483-00072 issued on September 15, 2006.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The new Mudguard emission unit has potential uncontrolled emissions that meet the exemption levels specified in 326 IAC 2-1.1-3(e)(1).

Per Permittee request, one (1) laminator press, constructed in 1997, which has a capability to handle 1.46 x 2.87 square meters for the largest part was removed from the emission unit list. This unit has negligible emissions.

Per Permittee request, three (3) water jet cutters, constructed in 1997, with a combined capacity of 60 headliners per hour were removed from the emission list. These units have negligible emissions.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this MSOP Renewal:

- (a) Compliance Monitoring Requirements for daily and monthly inspections to monitor the performance of dry filters for particulate control in surface coating activities were not incorporated.

Reason not incorporated: These requirements are now included as part of 326 IAC 6-3-2.

- (b) Compliance Determination Requirements appearing in MPR127-21099-00072 as Condition D.1.6 Testing Requirements for Ultralite Cell emission unit was not incorporated.

Reason not incorporated: The required one time stack test was completed by the Permittee on December 14 and 15, 2005.

The following terms and conditions from previous approvals have been revised in this MSOP Renewal:

(a) Permit Term

On December 16, 2007, rule revisions to 326 IAC 2-1.1-9 and 326 IAC 2-8-4 were finalized, allowing for ten (10) year permit terms on MSOP renewals. The Permit Term Condition in Section - B of the permit has been revised to reflect the ten (10) year permit term.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Porter County:

Pollutant	Designation
SO ₂	Cannot be classified for the area bounded on the north by Lake Michigan; on the west by the Lake County and Porter County line; on the south by I-80 and I-90; and on the east by the LaPorte County and Porter County line. The remainder of Porter County is better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Nonattainment Subpart 2 Moderate effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Nonattainment Severe 17 effective November 15, 1990, for the Chicago-Gary-Lake County area, including Porter County, for the 1-hour standard which was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM2.5.

(a) Ozone Standards

- (1) 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.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph Counties as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, and Shelby Counties as attainment for the 8-hour ozone standard.

- (4) 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.

(i) 1-hour ozone standard

On December 22, 2006 the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air quality Standard for ozone. *South Coast Air Quality Mgmt. Dist. v. EPA*, 472 F.3d 882 (D.C. Cir., December 22, 2006), *rehearing denied* 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007). The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the *South Coast* decision as follows: Gary-Lake-Porter County was previously designated as a severe non-attainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios under the area's previous one-hour standard designation. This means that a source must achieve the Lowest Achievable Emission Rate (LAER) if it exceeds 25 tons per year of VOC emissions and must offset any increase in VOC emissions by a decrease of 1.3 times that amount.

On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NO_x threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.

(ii) 8-hour ozone standard

VOC and NO_x emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Porter County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

(b) PM_{2.5}

U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Porter County as nonattainment for PM_{2.5}. On March 7, 2005, the Indiana Attorney General's Office, on behalf of IDEM, filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5.

(c) Other Criteria Pollutants

Porter County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) 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 and Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	61.91
PM ₁₀	61.91
SO ₂	0.13
VOC	14.93
CO	18.30
NO _x	21.79

HAPs	tons/year
Hexane	1.18
Methylene Chloride	0.26
Formaldehyde	1.10
Toluene	0.16
MDI	0.01
Worst Case HAP	1.18
Total	2.71

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (c) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

No previous emission data has been received from the source.

Federal Rule Applicability

- (a) The two (2) existing 6,000-gallon bulk organic storage tanks are not subject to the requirements of the New Source Performance Standard for Volatile Organic Liquid

Storage Vessels, 40 CFR 60.110b, Subpart Kb, which is incorporated by reference as 326 IAC 12, because their capacities are less than 75 cubic meters (19,813 gallons).

- (b) The two (2) existing 11,000-gallon bulk organic storage tanks are not subject to the requirement of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels, 326 IAC 12, (40 CFR 60.110b, Subpart Kb) because their capacities are less than 75 cubic meters (19,813 gallons).

There are no other New Source Performance Standards (326 IAC 12 and 40 CFR Part 60) applicable to this facility.

- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.
 - (1) The degreasing operations are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63, Subpart T (National Emission Standards for Halogenated Solvent Cleaning (326 IAC 14)), because only non-halogenated solvents are used for this operation.

State Rule Applicability - Entire Source

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

This source was constructed after the applicability date of August 7, 1977, however, it is not one of the 28 listed source categories defined in 326 IAC 2-2-1(gg)(1), and no major modifications were done to this source. The uncontrolled potential to emit of all regulated pollutants is less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

326 IAC 2-3 (Emission Offset)

Although the source is located in Porter County, this source is not subject to 326 IAC 2-3 (Emission Offset) because the potential to emit VOCs is less than twenty-five (25) tons per year. This source must obtain approval from IDEM, OAQ before undertaking any change or modification that would increase the potential to emit VOC to greater than 25 tons per year.

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

The source was constructed prior to July 27, 1997. Therefore, it is not subject to 326 IAC 2-4.1. This source has the potential to emit less than ten (10) tons per year of a single HAP or twenty-five (25) tons per year of any combination of HAPs. Therefore, the source is not subject to the provisions of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

This source, which is located in Porter County, is not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, does not emit VOC or NOx into the ambient air at levels equal to or greater than twenty-five (25) tons per year, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 8-7-2 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

This source, which is located in Porter County, is not subject to 326 IAC 8-7-2 because it does not have the potential to emit VOCs from the entire source at levels equal to or greater than twenty-five (25) tons per year and the total potential to emit VOC from the spray booths (HL-1 and PVC-2) is less than ten (10) tons per year.

State Rule Applicability – Individual Facilities

326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)

The curing ovens at the four (4) Ultralite Cells, identified as UL-1, UL-2, UL-3, and UL-4, are not subject to 326 IAC 6-2 because the curing ovens are not sources of indirect heating.

The eleven (11) roof air-makeup units are not subject to 326 IAC 6-2 because they are not sources of indirect heating.

The fifteen (15) space heaters are not subject to 326 IAC 6-2 because the heaters are not sources of indirect heating.

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

- (a) The source provided an emission factor of 0.86 pounds of PM/PM₁₀ per ton of padding for the type of Ultralite Cell installed at the source from stack tests conducted on December 14 and 15, 2005. Based on this emission factor, the hourly potential particulate matter emissions of each of the four (4) Ultralite Cells (UL-1, UL-2, UL-3, and UL-4) are calculated to be 0.36 pounds per hour, which is less than the exemption level of 0.551 pounds per hour. Therefore, the Ultralite Cells (UL-1, UL-2, UL-3, and UL-4) are exempt from the requirements of 326 IAC 6-3, pursuant to 326 IAC 6-3-1(b)(14).
- (b) The potential to emit from each of the four (4) Hot Mold Presses (HMP-1, 2, 3, and 4) is equal to 0.39 pounds per hour each, which is less than the exemption level of 0.551 pounds per hour. Therefore, the four (4) Hot Mold Presses (HMP-1, 2, 3, and 4) are exempt from the requirements of 326 IAC 6-3, pursuant to 326 IAC 6-3-1(b)(14).
- (c)
 - (1) Pursuant to 326 IAC 6-3-2(d), particulate from the one (1) headliner spray booth line, identified as HL-1, and the one (1) adhesive spray booth, identified as PVC-2, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
 - (2) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

- (3) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

Pursuant to 326 IAC 6-3-2(d), the dry filters shall be in operation at all times the one (1) headliner spray booth line is in operation, in order to comply with this limit.

- (d) The potential to emit from each of the two (2) Mudguard facilities (cell #9 and cell #15) is equal to 0.47 pounds per hour, which is less than the exemption level of 0.551 pounds per hour. Therefore, the Mudguard operation (cell #9 and cell #15) is exempt from the requirements of 326 IAC 6-3, pursuant to 326 IAC 6-3-1(b)(14).

326 IAC 7-1.1 (Sulfur dioxide emission limitations)

The four (4) Ultralite Cells, identified as UL-1, UL-2, UL-3, and UL-4, are each are not subject to the requirements of 326 IAC 7-1.1, because the potential to emit sulfur dioxide is less than twenty-five (25) tons per year or ten (10) pounds per hour.

326 IAC 8-1-6 (New Facilities - General Reduction Requirement)

There are no other Article 8 rules applicable to the following operations:

The mudguard operation, identified as cell #15, does not have the potential to emit VOCs at levels equal to or greater than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

The one (1) headliner adhesive spray booth line (HL-1) does not have potential VOC emissions equal to or greater than twenty-five (25) tons per year, therefore this facility is not subject to the provisions of 326 IAC 8-1-6.

The four (4) hot mold presses (HMP-1, 2, 3, and 4) each do not have potential VOC emissions equal to or greater than twenty-five (25) tons per year. Therefore, these facilities are not subject to the provisions of 326 IAC 8-1-6.

The four (4) Ultralite Cells (UL-1, UL-2, UL-3 and UL-4) each do not have the potential to emit VOCs at levels equal to or greater than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 8-3 (Organic Solvent Degreaser Operations)

The organic solvent degreasing operation, identified as the parts washer and the three (3) cold tank cleaners, is subject to 326 IAC 8-3-2 because it is an existing facility as of January 1, 1980 located in Porter County. The organic solvent degreasing operation is subject to 326 IAC 8-3-5 because it is located in Porter County and existing as of July 1, 1990. The organic solvent degreasing operation is subject to 326 IAC 8-3-8 because the source is a user of solvents in a cold cleaner degreaser which is located in Porter County.

The degreasing operation shall comply with the following requirements:

- (a) Pursuant to 326 IAC 8-3-2, the owner or operator shall:
- (1) Equip the cleaner with a cover;
 - (2) Equip the cleaner with a facility for draining cleaned parts;

- (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label summarizing the operation requirements; and
 - (6) 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.
- (b) Pursuant to 326 IAC 8-3-5(a), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one hand if:
 - A) The solvent volatility is greater than three-tenths (0.3) pounds per square inch (15 millimeters of mercury) measured at 38 degrees Celsius (100 degrees Fahrenheit);
 - B) The solvent is agitated; or
 - C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than six-tenths (0.6) pounds per square inch (thirty-two (32) millimeters of mercury) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in 326 IAC 8-3-5(b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than six-tenths (0.6) pounds per square inch (thirty-two (32) millimeters of mercury) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

- (c) Pursuant to 326 IAC 8-3-5(b), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.
- (d) Pursuant to 326 IAC 8-3-8, users, providers, and manufacturers of solvents for use in cold cleaning degreasers in Clark, Floyd, Lake, and Porter Counties, except for solvents intended to be used to clean electronic components, shall ensure that the following operating requirements are met:
- (1) On and after November 1, 1999, no person shall do the following:
 - (A) Cause or allow the sale of solvents for use in cold cleaning degreasing operations with a vapor pressure that exceeds two (2) millimeters of mercury (thirty-eight thousandths (0.038) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit) in an amount greater than five (5) gallons during any seven (7) consecutive days to an individual or business.
 - (B) Operate a cold cleaning degreaser with a solvent vapor pressure that exceeds two (2) millimeters of mercury (thirty-eight thousandths (0.038) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
 - (2) On and after May 1, 2001, no person shall do the following:
 - (A) Cause or allow the sale of solvents for use in cold cleaning degreasing operations with a vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit) in an amount greater than five (5) gallons during any seven (7) consecutive days to an individual or business.
 - (B) Operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
 - (3) On and after November 1, 1999, the following record keeping requirements shall be followed:
 - (A) All persons subject to (d)(1)(A) and (d)(2)(A) above shall maintain all of the following records for each sale:
 - (i) The name and address of the solvent purchaser.
 - (ii) The date of sale.
 - (iii) The type of solvent.
 - (iv) The volume of each unit of solvent sold.
 - (v) The total volume of the solvent.

- (vi) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (B) All persons subject to the requirements of subsection (d)(1)(B) and (d)(2)(B) above shall maintain each of the following records for each purchase:
 - (i) The name and address of the solvent supplier.
 - (ii) The date of purchase.
 - (iii) The type of solvent.
 - (iv) The volume of each unit of solvent.
 - (v) The total volume of the solvent.
 - (vi) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (4) All records required by subsection (3) above shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

326 IAC 8-9 (Volatile Organic Storage Vessels)

The two (2) six-thousand (6,000) gallon and the two (2) eleven-thousand (11,000) bulk volatile organic storage tanks are subject to 326 IAC 8-9 (Volatile Organic Storage Vessels) because they are located in Porter County. Since the storage capacity for each vessel is less than 39,000 gallons, the source is subject only to the recordkeeping and reporting provisions of 326 IAC 8-9-6(a) and 326 IAC 8-9-6(b) and are exempt from all other provisions of 326 IAC 8-9. The owner or operator shall maintain a record and submit to the department a report containing the following information:

- (1) The vessel identification;
- (2) The vessel dimensions;
- (3) The vessel capacity; and
- (4) A description of the emission control equipment for each vessel, as described in section 4(a) and 4(b) of this rule, or a schedule for installation of emission control equipment on vessels described in section 4(a) and 4(b) of this rule with a certification that the emission control equipment meets the applicable standard.

Recommendation

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

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

An application for the purposes of this review was received on January 22, 2008.

Conclusion

The operation of this stationary automotive polyurethane foam composite part/plastic headliner manufacturing plant shall be subject to the conditions of the attached MSOP Renewal No. M127-25941-00072.

**Appendix A: Emission Calculations
Source-Wide Emissions Summary**

Company Name: UGN, Inc.
Address City IN Zip: 2252 Industrial Drive, Valparaiso, IN 46383
Permit No.: M127-25941-00072
Plt ID: 127-00072
Reviewer: Donald McQuigg
Date: 4-Mar-08

POTENTIAL TO EMIT BEFORE CONTROLS (tons/year)

Source	PM	PM ₁₀	SO ₂	NO _x	VOC	CO	HAPS				
							MDI	Formaldehyde	Toluene	Hexane	Methylene Chloride
Roof Air Makeup Units	0.90	0.90	0.07	11.78	0.65	9.90	-	0.009	-	0.212	-
Space Heaters	0.12	0.12	0.01	1.60	0.09	1.34	-	0.001	-	0.029	-
Mud Guard (Cell #9 & Cell #15)	4.13	4.13	-	-	0.38	-	-	-	-	-	-
Headliner Spray Booth (HL-1)	10.73	10.73	-	-	0.04	-	0.008	-	-	-	-
Hot Mold Presses (HMP-1, 2, 3, 4)	6.76	6.76	-	-	2.15	-	-	1.08	-	-	-
Ultralite Cells (UL-1, UL-2, UL-3, UL-4)	6.30	6.30	0.05	8.41	3.20	7.06	-	0.006	-	0.15	0.26
Adhesive Spray Booth (PVC-2)*	10.60	10.60	-	-	1.11	-	-	-	-	-	-
Miscellaneous Products Usage	22.37	22.37	-	-	3.84	-	-	-	0.16	0.79	-
Parts Washer	-	-	-	-	1.19	-	-	-	-	-	-
Mold Cells	-	-	-	-	0.09	-	0.003	-	-	-	-
Three (3) Cold Tank Cleaners	-	-	-	-	2.39	-	-	-	-	-	-
TOTAL	61.91	61.91	0.13	21.79	15.13	18.30	0.01	1.10	0.16	1.18	0.26

"-" indicates that the emission unit or process does not emit the designated pollutant.

* The potential to emit VOCs, PM and PM₁₀ is from First Notice Only Change No. 127-18606-00072, issued March 30, 2004.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
Eleven (11) Roof Air-Makeup Units**

Company Name: UGN, Inc.
Address City IN Zip: 2252 Industrial Drive, Valparaiso, IN 46383
Permit No.: M127-25941-00072
Plt ID: 127-00072
Reviewer: Donald McQuigg
Date: 3-Mar-08

Heat Input Capacity
MMBtu/hr
26.9 (11 units total)

Potential Throughput
MMCF/yr
235.7

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM ₁₀ *	SO ₂	NO _x	VOC	CO
	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.90	0.90	0.07	11.78	0.65	9.90

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

**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32

Methodology

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF - 1,000,000 Cubic Feet of Gas

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

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

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

See page 3 for HAPs emissions calculations.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
Eleven (11) Roof Air-Makeup Units**

Company Name: UGN, Inc.
Address City IN Zip: 2252 Industrial Drive, Valparaiso, IN 46383
Permit No.: M127-25941-00072
Plt ID: 127-00072
Reviewer: Donald McQuigg
Date: 4-Mar-08

HAPs - Organics

Emission Factor in lb/MMCF	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.475E-04	1.414E-04	8.838E-03	2.121E-01	4.007E-04

HAPs - Metals

Emission Factor in lb/MMCF	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	5.892E-05	1.296E-04	1.650E-04	4.478E-05	2.475E-04

Methodology is the same as page 2.

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

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
Fifteen (15) Natural Gas-Fired Space Heaters**

Company Name: UGN, Inc.
Address City IN Zip: 2252 Industrial Drive, Valparaiso, IN 46383
Permit No.: M127-25941-00072
Plt ID: 127-00072
Reviewer: Donald McQuigg
Date: 3-Mar-08

Heat Input Capacity
MMBtu/hr
3.64 (15 units total)

Potential Throughput
MMCF/yr
31.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM ₁₀ *	SO ₂	NO _x	VOC	CO
	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.12	0.12	0.01	1.60	0.09	1.34

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

**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32

Methodology

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF - 1,000,000 Cubic Feet of Gas

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

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

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

See page 5 for HAPs emissions calculations.

**Appendix A: Emission Calculations
 Natural Gas Combustion Only
 MMBTU/HR<100
 Fifteen (15) Natural Gas-Fired Space Heaters**

Company Name: UGN, Inc.
Address City IN Zip: 2252 Industrial Drive, Valparaiso, IN 46383
Permit No.: M127-25941-00072
Pit ID: 127-00072
Reviewer: Donald McQuigg
Date: 4-Mar-08

HAPs - Organics

Emission Factor in lb/MMCF	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.350E-05	1.914E-05	1.196E-03	2.871E-02	5.424E-05

HAPs - Metals

Emission Factor in lb/MMCF	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	7.976E-06	1.755E-05	2.233E-05	6.062E-06	3.350E-05

Methodology is the same as page 4.

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

Appendix A: Emissions Calculations
Emission Summary for Ultralite Cells (UL1-, UL-2, UL-3, UL-4)

Company Name: UGN, Inc.
Address City IN Zip: 2252 Industrial Drive, Valparaiso, Indiana 46383
Permit No.: M127-25941-00072
Pit ID: 127-00072
Reviewer: Donald McQuigg
Date: 4-Mar-08

Category	Uncontrolled Potential Emissions (tons/year)			
	Emissions Generating Activity			
	Pollutant	Natural Gas Combustion*	Heating of Padding*	TOTAL
Criteria Pollutants	PM	NA*	6.30	6.30
	PM10	NA*	6.30	6.30
	SO2	0.05	-	0.05
	NOx	8.41	-	8.41
	VOC	NA*	3.20	3.20
	CO	7.06	-	7.06
Hazardous Air Pollutants**	Chloromethane	-	1.4E-03	1.4E-03
	1,3-Butadiene	-	6.0E-03	6.0E-03
	Methylene Chloride	-	0.26	0.26
	2-Butanone	-	2.7E-03	2.7E-03
	m- and p-Xylene	-	5.4E-03	5.4E-03
	Benzene	NA*	7.2E-03	7.2E-03
	Dichlorobenzene	1.0E-04	-	1.0E-04
	Formaldehyde	6.3E-03	-	6.3E-03
	n-Hexane	0.15	-	0.15
	Toluene	NA*	4.3E-03	4.3E-03
	Lead	4.2E-05	-	4.2E-05
	Cadmium	9.3E-05	-	9.3E-05
	Chromium	1.2E-04	-	1.2E-04
	Manganese	3.2E-05	-	3.2E-05
	Nickel	1.8E-04	-	1.8E-04
	Totals	0.16	0.28	0.44
		Worse Case HAP	0.26	

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

* NA = Not Applicable. The emission factor for PM/PM10 and VOCs from heating of the padding in the curing ovens includes PM/PM10 and VOCs emitted as a result of combustion of natural gas.

** HAP emissions methodology for heating of padding is documented in MPR127-21099-00072 for installation of UL-1 and UL-2. The HAP emissions for all four Ultralite Cells is twice the values reported in MPR127-21099-00072.

"-" indicates that the emission unit or process does not emit the designated pollutant.

Appendix A: Emissions Calculations
Ultralite Natural Gas Combustion (UL-1, UL-2, UL-3, UL-4)
MM BTU/HR <100

Company Name: UGN, Inc.
Address City IN Zip: 2252 Industrial Drive, Valparaiso, Indiana 46383
Permit No.: M127-25941-00072
Plt ID: 127-00072
Reviewer: Donald McQuigg
Date: 4-Mar-08

Emission Unit	Number of Burner Units	Unit Heat Input Capacity MMBtu/hr	Combined Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Pollutant					
					PM*	PM10*	SO2	NOx**	VOC	CO
					Emission Factor (lb/MMCF)					
					7.6	7.6	0.6	100	5.5	84.0
					Potential Emission (tons/yr)					
					PM*	PM10*	SO2	NOx**	VOC	CO
UL-1 Curing Ovens	2	2.40	4.800	42.05	0.160	0.160	0.013	2.102	0.116	1.766
UL-2 Curing Ovens	2	2.40	4.800	42.05	0.160	0.160	0.013	2.102	0.116	1.766
UL-3 Curing Ovens	2	2.40	4.800	42.05	0.160	0.160	0.013	2.102	0.116	1.766
UL-4 Curing Ovens	2	2.40	4.800	42.05	0.160	0.160	0.013	2.102	0.116	1.766
Totals	8		19.2		0.639	0.639	0.050	8.410	0.463	7.064

Pollutant	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
	Potential Emission (tons/yr)									
Emission Unit	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
UL-1 Curing Ovens	4.4E-05	2.5E-05	1.6E-03	0.038	7.1E-05	1.1E-05	2.3E-05	2.9E-05	8.0E-06	4.4E-05
UL-2 Curing Ovens	4.4E-05	2.5E-05	1.6E-03	0.038	7.1E-05	1.1E-05	2.3E-05	2.9E-05	8.0E-06	4.4E-05
UL-3 Curing Ovens	4.4E-05	2.5E-05	1.6E-03	0.038	7.1E-05	1.1E-05	2.3E-05	2.9E-05	8.0E-06	4.4E-05
UL-4 Curing Ovens	4.4E-05	2.5E-05	1.6E-03	0.038	7.1E-05	1.1E-05	2.3E-05	2.9E-05	8.0E-06	4.4E-05
Totals	1.8E-04	1.0E-04	6.3E-03	0.151	2.9E-04	4.2E-05	9.3E-05	1.2E-04	3.2E-05	1.8E-04

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

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

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

Methodology

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

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

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

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu, MMCF = 1,000,000 Cubic Feet of Gas

Abbreviations

PM = Particulate Matter

PM10 = Particulate Matter (<10 microns)

SO2 = Sulfur Dioxide

NOx = Nitrous Oxides

VOC = Volatile Organic Compounds

CO = Carbon Monoxide

DCB = Dichlorobenzene

Pb = Lead

Cd = Cadmium

Cr = Chromium

Mn = Manganese

Ni = Nickel

Appendix A: Emission Calculations
Particulate Emissions from Ultralite Cell Operation (UL-1, UL-2, UL-3, UL-4)

Company Name: UGN, Inc.
Address City IN Zip: 2252 Industrial Drive, Valparaiso, IN 46383
Permit No.: M127-25941-00072
Pit ID: 127-00072
Reviewer: Donald McQuigg
Date: 4-Mar-08

	Maximum Throughput Rate (tons/hr)	*Emission Factor (lbs/ton)	PM/PM ₁₀ Emissions			
			PTE Before Controls (lbs/hr)	PTE Before Controls (tons/yr)	Control Efficiency	PTE After Controls (tons/yr)
UL-1	0.42	0.86	0.36	1.6	0.0	1.6
UL-2	0.42	0.86	0.36	1.6	0.0	1.6
UL-3	0.42	0.86	0.36	1.6	0.0	1.6
UL-4	0.42	0.86	0.36	1.6	0.0	1.6
Total				6.3		6.3

* The emission factor was obtained from stack tests conducted by the Permittee on December 14 and 15, 2005.

** Assume all PM emissions are PM₁₀.

Methodology

Potential to Emit PM/PM₁₀ (tons/year) = Maximum Rate (tons/hour) * Emission Factor (lbs/ton) * 1 ton/2000 lbs * 8760 hours/year

Appendix A: Emission Calculations
VOC Emissions from Ultralite Cell Operation (UL-1, UL-2, UL-3, UL-4)

Company Name: UGN, Inc.
Address City IN Zip: 2252 Industrial Drive, Valparaiso, IN 46383
Permit No.: M127-25941-00072
Plt ID: 127-00072
Reviewer: Donald McQuigg
Date: 4-Mar-08

	Maximum Throughput Rate (tons/hr)	*Emission Factor (lbs/ton)	VOC Emissions			
			PTE Before Controls (lbs/hr)	PTE Before Controls (tons/yr)	Control Efficiency	PTE After Controls (tons/yr)
UL-1	0.42	0.44	0.185	0.8	0.0	0.8
UL-2	0.42	0.44	0.185	0.8	0.0	0.8
UL-3	0.42	0.44	0.185	0.8	0.0	0.8
UL-4	0.42	0.44	0.185	0.8	0.0	0.8
Total				3.2		3.2

* The emission factor was obtained from stack tests conducted by the Permittee on December 14 and 15, 2005.

** Assume all PM emissions are PM₁₀.

Methodology

Potential to Emit PM/PM10 (tons/year) = Maximum Rate (tons/hour) * Emission Factor (lbs/ton) * 1 ton/2000 lbs * 8760 hours/year

Appendix A: Emission Calculations
Particulate Emissions from Mud Guard Operation- (Cell #9 and #15)

Company Name: UGN, Inc.
Address City IN Zip: 2252 Industrial Drive, Valparaiso, IN 46383
Permit No.: M127-25941-00072
Plt ID: 127-00072
Reviewer: Donald McQuigg
Date: 4-Mar-08

	Maximum Throughput Rate (tons/hr)	*Emission Factor (lbs/ton)	PM/PM ₁₀ Emissions			
			PTE Before Controls (lbs/hr)	PTE Before Controls (tons/yr)	Control Efficiency	PTE After Controls (tons/yr)
Cell #9	0.18	2.62	0.47	2.07	0.00	2.07
Cell #15	0.18	2.62	0.47	2.07	0.00	2.07
		Total	0.94	4.13		4.13

* The emission factor was obtained from a stack test conducted at a similar facility in New Jersey on January 3, 2002.

** Assume all PM emissions are PM₁₀.

Methodology

Potential to Emit PM/PM₁₀ (tons/year) = Maximum Rate (tons/hour) * Emission Factor (lbs/ton) * 1 ton/2000 lbs * 8760 hours/year

Appendix A: Emission Calculations
VOC Emissions from Mud Guard Operation- (Cell #9 and #15)

Company Name: UGN, Inc.
Address City IN Zip: 2252 Industrial Drive, Valparaiso, IN 46383
Permit No.: M127-25941-00072
Pit ID: 127-00072
Reviewer: Donald McQuigg
Date: 4-Mar-08

Material	Maximum Throughput Rate (tons/hr)	Emission *Factor (lbs/ton)	VOC PTE Before Controls (lbs/hr)	VOC PTE Before Controls (tons/yr)
PET and Latex Material (Cell #9)	0.18	0.24	0.04	0.19
PET and Latex Material (Cell #15)	0.18	0.24	0.04	0.19
Total			0.38	

* The emission factor was obtained from a stack test conducted at a similar facility in New Jersey on January 3, 2002.

Methodology

Potential to Emit VOC (tons/year) = Maximum Rate (lbs/hour) * 1ton/2000 lbs * 8760 hours/year

Appendix A: Emission Calculations
VOC and PM Emissions from Hot Molding Presses (HMP #1, #2, #3, #4)

Company Name: UGN, Inc.
Address: 2252 Industrial Drive, Valparaiso, Indiana 46383
Permit No.: M127-25941-00072
Plt ID: 127-00072
Reviewer: Donald McQuigg
Date: 4-Mar-08

Emission Unit	Maximum Throughput Rate (lbs/hour)	* Emission Factor PM/PM10 (lb/ton)	PTE of PM/PM10 (lbs/hour)	PTE of PM/PM10 (tons/year)	** Particulate Matter Limitation (lb/hour)
HMP-1	236	3.27	0.39	1.69	0.98
HMP-2	236		0.39	1.69	
HMP-3	236		0.39	1.69	
HMP-4	236		0.39	1.69	
TOTAL				6.76	

* Emission factor of 3.27 lb per ton of plastic component is based on a stack test performed at the source on September 23, 2003.

Assume all PM emissions are equal to PM10.

PM and PM10 emission factor are filterable and condensable PM and PM10 combined.

** Calculated as per the process weight rule, 326 IAC 6-3-2.

METHODOLOGY

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

Emission Unit	Maximum Throughput Rate (lbs/hour)	* Emission Factor VOC (lb/ton)	PTE of VOC (tons/year)	Weight % Formaldehyde	PTE of Formaldehyde (tons/year)
HMP-1	236.0	1.04	0.538	0.026%	0.27
HMP-2	236.0		0.538		0.27
HMP-3	236.0		0.538		0.27
HMP-4	236.0		0.538		0.27
TOTAL			2.15		1.08

* Emission factor of 1.04 lb VOC per ton of plastic component is based on stack test results performed at the source on September 23, 2003.

METHODOLOGY

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

**Appendix A: Emission Calculations
MDI Emissions from Headliner Spray Booth (HL-1)**

Company Name: UGN, Inc.
Address City IN Zip: 2252 Industrial Drive, Valparaiso, IN 46383
Permit No.: M127-25941-00072
Plt ID: 127-00072
Reviewer: Donald McQuigg
Date: 4-Mar-08

MDI EMISSIONS CALCULATION

	HL-1
Largest part area to be sprayed (m ²)	4.19
Rate of adhesive application (grams/m ²)	60
Maximum production rate (parts/hr)	60
"Tack free" temperature (Kelvin)	343
"Tack free" (u) across coated surfaces (m/sec)	3.0

Evaporation Rate (gm/sec):	The vapor pressure in atmosphere:	Average mol wt.	Exposed area (m ²)
W 0.00048	P_T 1.32E-06	M_T 250	A 8.38
	VP mmHg 1E-03		
	Hg pressure (mm) 760		

	HL-1
*VOC EMISSIONS (grams/part)	0.029
VOC EMISSIONS (TPY)	0.017
MDI	45%
PMDI	55%
**MDI EMISSIONS (TPY)	0.0075

*VOC emission is both for MDI and PMDI

** MDI emissions are based on 60 parts per hour for HL-1

Methodology

MDI emissions calculation based on an equation from the society of plastic industry

Evaporation Rate (gm/sec) $W = (25.4 \times P_T \times M_T \times u^{0.78} \times A) / T$ in kelvin

Vapor Pressure in atmosphere $P_T = (VP \text{ mmHg} / \text{Barometric Pressure})$

The adhesive is applied to both sides of the largest part area $A = 2 \times \text{largest part area to be sprayed (m}^2\text{)}$

VOC emissions (grams/part) = $W \text{ (gms/sec)} \times 60 \text{ sec/min} \times 1 \text{ min/part}$

VOC emissions (tons per year) = $\text{VOC (gm/part)} \times \text{number of parts/hr} \times 1 \text{ lb/454 gm} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/2000 lbs.}$

MDI emissions = $\text{VOC emissions (gm/part)} \times \text{MDI \%} \times \text{number of parts/hr} \times 1 \text{ lb/454 gm} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/2000 lbs}$

**Appendix A: Emissions Calculations
VOC and PM Emissions from Headliner Spray Booth HL-1**

Company Name: UGN, Inc.
Address City IN Zip: 2252 Industrial Drive, Valparaiso, IN 46383
Permit No.: M127-25941-00072
Plt ID: 127-00072
Reviewer: Donald McQuigg
Date: 4-Mar-08

VOC POTENTIAL TO EMIT BEFORE CONTROLS

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds/hour)	Potential VOC (pounds/day)	Potential VOC (tons/yr)
Peelable Wall Coating in HL-1	9.1	59.4%	57.4%	2.0%	63.5%	34.40%	0.0009	60.0	0.50	0.18	0.01	0.24	0.04

Potential VOC Emissions: 0.01 0.24 **0.04**

Methodology

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential to Emit VOC (pounds/hour) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential to Emit VOC (pounds/day) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential to Emit VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

PARTICULATE POTENTIAL TO EMIT BEFORE CONTROLS

	*Maximum Throughput Rate (lbs/hr)	**PM/PM ₁₀ PTE before controls (tons/year)
PM/PM₁₀ from HL-1	2.45	10.7

*Maximum throughput rate is based on the registration 127-11623-00072 issued January 12, 2002 where PM emissions were prorated from 38.7 parts/hr to 60 parts/hr for HL-1 based on test data.
**Assume all PM emissions are PM₁₀.

Methodology

Potential To Emit Particulate Matter (tons/year) = Maximum Usage (lbs/hour) x 8760 hrs/year x 1 ton/2000 lbs

**Appendix A: Emission Calculations
VOC and HAP Emissions from Miscellaneous Products**

Company Name: UGN, Inc.
Address City IN Zip: 2252 Industrial Drive, Valparaiso, IN 46383
Permit No.: M127-25941-00072
Plt ID: 127-00072
Permit Reviewer: Donald McQuigg
Date: 4-Mar-08

Material	Density (Lb/Gal)	Max Usage Rate (gal/hr)	Weight % Solids	Weight % VOC	Weight % Hexane	Weight % Toluene	Weight % Acetaldehyde	VOC Emissions (ton/yr)	Hexane Emissions (ton/yr)	Toluene Emissions (ton/yr)	Acetaldehyde Emissions (ton/yr)	Particulate Potential (ton/yr)	Transfer Efficiency
3-M Scotch-Grip IND Black ADH	6.8	0.114	24.0%	60.3%	14.0%	4.68%		2.06	0.48	0.16	0.0	0.49	40%
Slautterback Strip N-Clean # 9	7.5	0.125	0.0%	5.0%				0.21	0.00	0.000	0.000	0.0	0%
SD20 Cleaner	8.4	0.046	1.0%	17.27%				0.29	0.00	0.000	0.000	0.010	40%
Shaw 440 WA Water Based Mold Release	8.3	8.900	10.0%	0%				0.00	0.00	0.000	0.000	19.48	40%
Shaw 391 WA Water Based Mold Release	8.3	0.199	10.0%	0%				0.00	0.00	0.000	0.000	0.44	40%
L-239W	8.3	0.199	10.0%	0%				0.00	0.00	0.000	0.000	0.44	40%
Dow 36 Water Based Mold Release	8.3	0.133	50.0%	5.0%			0.100%	0.24	0.00	0.000	0.005	1.46	40%
Adhesive Line Cleaner	7.5	0.125	0.0%	100.0%				0.21	0.00	0.000	0.000	0.00	0%
General Purpose Adhesive	6.7	0.036	10.0%	80.0%	30.0%			0.84	0.32	0.000	0.000	0.06	40%

*Material applied using airless spray guns and air atomization spray guns

Total Potential Emissions 3.84 0.79 0.16 0.00 22.37

Methodology

Potential to Emit VOC (tons/yr) = Density (lb/gal) * Max Usage (gal/hour) * Weight % VOC * 8760 hours/yr * 1 ton/2000 lbs
 Potential to Emit HAPS (tons/yr) = Density (lb/gal) * Max Usage (gal/hour) * Weight % HAP * 8760 hours/yr * 1 ton/2000 lbs
 Potential to Emit PM/PM10 (tons/year) = Density (lb/gal) * Max Usage (gal/hour) * Weight % Solids * 8760 hours/yr * 1ton/2000lbs * (1-Transfer Efficiency %)

**Appendix A: Emission Calculations
VOC Emissions from Parts Washer**

Company Name: UGN, Inc.
Address City IN Zip: 2252 Industrial Drive, Valparaiso, IN 46383
Permit No.: M127-25941-00072
Pit ID: 127-00072
Permit Reviewer: Donald McQuigg
Date: 4-Mar-08

Material	Usage (gal/day)	VOC Content (lb/gal)	Volatile Component (%)	Flash Off (%)	Potential VOC (tons/yr)
Parts Washer	1.00	6.54	100%	100%	1.19

Methodology

Potential to Emit VOC (tons/year) = Usage (gal/day) * VOC Content (lb/gal) * Volatile Component (%) * Flash Off (%) * 365 days/yr * 1 ton/2000 lbs

**Appendix A: Emission Calculations
VOC and HAP Emissions from Mold Cells**

Company Name: UGN, Inc.
Address City IN Zip: 2252 Industrial Drive, Valparaiso, IN 46383
Permit No.: M127-25941-00072
Pit ID: 127-00072
Reviewer: Donald McQuigg
Date: 4-Mar-08

Material	Maximum Throughput Rate (tons/hr)	Emission Factor* (lbs/ton)	PTE Before Controls (tons/yr)
**ISO (MDI)	0.23841	0.0033	0.0034
Polyol	0.51734	0.0033	0.0075
Barrier	5.48503	0.0033	0.0793

Potential Emissions **0.09**

* Emission factor of 0.0033 lbs VOC/ton polyurethane foam from CP 127-6314-00072 issued on September 5, 1996.

** Assume all VOC emissions are MDI.

Methodology

Potential to Emit VOC (tons/year) = Maximum Throughput Rate (tons/hour) x Emission Factor (lbs/ton) x 1 ton/2000 lbs x 8760 hours/year

Appendix A: Emission Calculations
VOC emissions from 3 Cold Tank Cleaners - 20, 30 and 85 gallon tanks

Company Name: UGN, Inc.
Address City IN Zip: 2252 Industrial Drive, Valparaiso, IN 46383
MSOP: M127-25941-00072
Plt ID: 127-00072
Reviewer: Donald McQuigg
Date: 4-Mar-08

Material	Density (lb/gal)	Usage Rate (gal/day)	Volatile Component (%)	Potential VOC (lbs/hr)	Potential VOC (tons/yr)
Crystal Clean	6.54	2.0	100%	4774	2.39

Potential Emissions **2.39**

METHODOLOGY

Potential to Emit VOC (tons/year) = Density (lb/gal) * Usage Rate (gal/day) * Volatile Component (%) * 365 day/year * 1 ton/2000 lb