



# 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](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: March 27, 2008

RE: Momentive Performance Materials USA, Inc. / 033-25973-00075

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

## Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot12/3/07



# 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](http://www.idem.IN.gov)

March 27, 2008

Mr. Steve Klarman  
Momentive Performance Materials USA Inc.  
420 North Taylor Road  
Garrett, Indiana 46738

Re: 033-25973-00075  
First Administrative Amendment to  
FESOP 033-22847-00075

Dear Mr. Steve Klarman:

Momentive Performance Materials USA Inc. was issued a Federally Enforceable State Operating Permit (FESOP) Renewal on January 22, 2008 for the operation of a customized and specialty silicone elastomers manufacturing operation. A letter requesting certain changes in the operating permit was received on January 22, 2008. Pursuant to the provisions of 326 IAC 2-8-10 the permit is hereby administratively amended as described in the attached Technical Support Document.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Bryan Lange, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7854 to speak directly to Mr. Lange. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027 and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Sincerely,

*Original document signed by*

Matthew Stuckey, Chief  
Permits Branch  
Office of Air Quality

Attachments  
ERG/BL

cc: File - DeKalb County  
U.S. EPA, Region V  
DeKalb County Health Department  
Air Compliance Section Inspector  
Compliance Data Section  
Administrative and Development  
Technical Support and Modeling



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(317) 232-8603  
(800) 451-6027  
www.IN.gov/idem

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

**Momentive Performance Materials USA Inc.**  
**420 North Taylor Road**  
**Garrett, Indiana 46738**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F033-22847-00075	
Issued/Original signed by,  Matthew Stuckey, Deputy BranchChief Permits Branch Office of Air Quality	Issuance Date: January 22, 2008  Expiration Date: January 22, 2013

Administrative Amendment No.: 033-25973-00075	
Issued by: <i>Original document signed by</i> Matthew Stuckey, BranchChief Permits Branch Office of Air Quality	Issuance Date: March 27, 2008  Expiration Date: January 22, 2013

## TABLE OF CONTENTS

<b>A. SOURCE SUMMARY.....</b>	<b>5</b>
A.1 General Information [326 IAC 2-8-3(b)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(l)]	
A.4 FESOP Applicability [326 IAC 2-8-2]	
<b>B. GENERAL CONDITIONS .....</b>	<b>7</b>
B.1 Definitions [326 IAC 2-8-1]	
B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-8-6]	
B.5 Severability [326 IAC 2-8-4(4)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9) [326 IAC 2-8-5(a)(1)]	
B.12 Emergency Provisions [326 IAC 2-8-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.17 Permit Renewal [326 IAC 2-8-3(h)]	
B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.20 Source Modification Requirement [326 IAC 2-8-11.1]	
B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2] [IC 13-30-3-1]	
B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
<b>C. SOURCE OPERATION CONDITIONS.....</b>	<b>16</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Overall Source Limit [326 IAC 2-8] [362 IAC 2-2]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
<b>Testing Requirements [326 IAC 2-8-4(3)]</b>	
C.8 Performance Testing [326 IAC 3-6]	
<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	

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

- C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
- C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]  
[326 IAC 2-8-5(1)]

**Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

- C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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

- C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

- C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 23**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.1.2 FESOP Limits [326 IAC 2-8]
- D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.1.5 Particulate Control
- D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutant (HAP) Emissions  
Determination

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

- D.1.7 Visible Emissions Notations
- D.1.8 Parametric Monitoring

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

- D.1.9 Record Keeping Requirements
- D.1.10 Reporting Requirements

**D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 29**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

- D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]
- D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

Certification Form.....	31
Emergency Occurrence Form.....	32
Quarterly Report Form, VOC emission limit, Mixing process 1 .....	34
Quarterly Report Form, VOC emission limit, Mixing process 2 .....	35
Quarterly Report Form, VOC emission limit, Mixing process 3 .....	36
Quarterly Report Form, VOC emission limit, Compounding .....	37
Quarterly Report Form, VOC emission limit, Mixing and Compounding .....	38

Quarterly Report Form, VOC emission limit, Mixing and Compounding ..... 39  
Quarterly Report Form, Total HAP emission limit, Mixing and Compounding..... 40  
Quarterly Deviation and Compliance Monitoring Report Form ..... 41

## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

---

The Permittee owns and operates a stationary customized and specialty silicone elastomers manufacturing operation.

Source Address:	420 North Taylor Road, Garrett, Indiana 46738
Mailing Address:	420 North Taylor Road, Garrett, Indiana 46738
General Source Phone Number:	(260) 357-6161
SIC Code:	3069
County Location:	DeKalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

---

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

One (1) polydimethylsiloxane mixing operation consisting of one (1) 60,000 pound bulk storage silo, constructed in 2002, and:

- (a) One (1) mixing process, identified as Mixing Process #1, constructed prior to 2002, including two (2) 2,200 pound raw material silos, one (1) transfer conveyor system, and one (1) mixer (Mixer #3), with a nominal mixer volume of 300 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting emissions outside the building;
- (b) One (1) mixing process, identified as Mixing Process #2, constructed in 2002, including one (1) 2,200 pound raw material storage silo, one (1) transfer conveyor system, and one (1) mixer (Mixer #1), with a nominal mixer volume of 500 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting emissions outside the building;
- (c) One (1) mixing process, identified as Mixing Process #3, constructed in 2002, including one (1) 2,200 pound raw material storage silo, one (1) transfer conveyor system, and one (1) mixer (Mixer #2), with a nominal mixer volume of 500 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting outside the building; and
- (d) One (1) batch mixing operation, identified as compounding, including ten (10) mixing processes:
  - (1) One (1) mixer with a nominal mixer volume of 25 gallons, identified as Mixer #11, constructed in 2005, with particulate emissions controlled by a baghouse identified as BH2, exhausting outside the building.

- (2) Two (2) mixers, identified as Mixer #4 and Mixer #9, each with a nominal mixer volume of 25 gallons, with particulate emissions for these mixers controlled by a baghouse identified as BH5 operated for industrial hygiene purposes only, exhausting inside the building; Mixer #4 and Mixer 9 were constructed prior to 2002.
- (3) Three (3) mixers with a nominal mixer volume of 50, 300, and 500 gallons, identified as Mixer #6, Mixer #12, and Mixer #10 respectively. Particulate emissions from these mixers are controlled by two (2) baghouses identified as BH5 and BH7 operated for industrial hygiene purposes only, exhausting inside the building; Mixer #6 was constructed in 2002 and exhausts to BH5; Mixer #10 was constructed in 2003 and exhausts to BH7; and Mixer #12 was constructed in 2006 and exhausts to BH5. Mixing operations include two (2) bag dump stations and two (2) bulk bag unloading units.
- (4) One (1) 500-gallon mixer (identified as LSR Mixer #1), two (2) 50-gallon mixers (identified as LSR Mixers #2 and #4), and one (1) 10-gallon mixer (identified as LSR Mixer #3). Particulate emissions from each mixer are controlled by a baghouse identified as BH3, which exhausts inside the building. LSR Mixer #4 was constructed in 2005; all other mixers were constructed in 2004.

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

This stationary source also includes the following insignificant activities:

- (a) Two (2) recirculating self-contained parts washer dip tanks. These degreasing operations do not exceed 145 gallons per 12 months; including
  - (1) One (1) degreasing operation is located in the Maintenance Area and was constructed after 1990 [326 IAC 8-3-2][326 IAC 8-3-5].
  - (2) One (1) degreasing operation is located in the Custom LSR Area and was constructed after 1990 [326 IAC 8-3-2][326 IAC 8-3-5].
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. These gas-fired heaters are used to heat the building.
- (c) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (d) Closed loop heating and cooling systems.
- (e) Laboratory and research and development activities as defined in 326 IAC 2-7-1(21)(D).

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

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-8-1]**

---

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### **B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

- 
- (a) This permit, F033-22847-00075, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

---

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

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

### **B.4 Enforceability [326 IAC 2-8-6]**

---

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### **B.5 Severability [326 IAC 2-8-4(4)]**

---

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

### **B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

---

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

### **B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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

**B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]**

---

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

**B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

---

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]**

---

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

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

B.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865

Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

---

- (a) All terms and conditions of permits established prior to F033-22847-00075 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

---

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

---

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

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

---

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

---

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

---

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

---

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

---

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]**

---

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]**

---

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

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

#### C.2 Overall Source Limit [326 IAC 2-8] [362 IAC 2-2]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limit renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

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

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

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

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

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

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

---

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 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 Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

### **Testing Requirements [326 IAC 2-8-4(3)]**

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

---

- (a) All required 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.9 Compliance Requirements [326 IAC 2-1.1-11]**

---

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any

monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

#### **C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

---

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

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

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

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

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

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

---

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

#### **C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

---

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

### **Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

---

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

#### **C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

---

- (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 [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

#### **C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

---

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

---

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## **Stratospheric Ozone Protection**

### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

---

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

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

One (1) polydimethylsiloxane mixing operation consisting of one (1) 60,000 pound bulk storage silo, constructed in 2002, and:

- (a) One (1) mixing process, identified as Mixing Process #1, constructed prior to 2002, including two (2) 2,200 pound raw material silos, one (1) transfer conveyor system, and one (1) mixer (Mixer #3), with a nominal mixer volume of 300 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting emissions outside the building;
- (b) One (1) mixing process, identified as Mixing Process #2, constructed in 2002, including one (1) 2,200 pound raw material storage silo, one (1) transfer conveyor system, and one (1) mixer (Mixer #1), with a nominal mixer volume of 500 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting emissions outside the building;
- (c) One (1) mixing process, identified as Mixing Process #3, constructed in 2002, including one (1) 2,200 pound raw material storage silo, one (1) transfer conveyor system, and one (1) mixer (Mixer #2), with a nominal mixer volume of 500 gallons, with particulate emissions controlled by a baghouse identified as BH2, exhausting outside the building; and
- (d) One (1) batch mixing operation, identified as compounding, including ten (10) mixing processes:
  - (1) One (1) mixer with a nominal mixer volume of 25 gallons, identified as Mixer #11, constructed in 2005, with particulate emissions controlled by a baghouse identified as BH2, exhausting outside the building.
  - (2) Two (2) mixers, identified as Mixer #4 and Mixer #9, each with a nominal mixer volume of 25 gallons, with particulate emissions for these mixers controlled by a baghouse identified as BH5 operated for industrial hygiene purposes only, exhausting inside the building; Mixer #4 and Mixer 9 were constructed prior to 2002.
  - (3) Three (3) mixers with a nominal mixer volume of 50, 300, and 500 gallons, identified as Mixer #6, Mixer #12, and Mixer #10 respectively. Particulate emissions from these mixers are controlled by two (2) baghouses identified as BH5 and BH7 operated for industrial hygiene purposes only, exhausting inside the building; Mixer #6 was constructed in 2002 and exhausts to BH5; Mixer #10 was constructed in 2003 and exhausts to BH7; and Mixer #12 was constructed in 2006 and exhausts to BH5. Mixing operations include two (2) bag dump stations and two (2) bulk bag unloading units.
  - (4) One (1) 500-gallon mixer (identified as LSR Mixer #1), two (2) 50-gallon mixers (identified as LSR Mixers #2 and #4), and one (1) 10-gallon mixer (identified as LSR Mixer #3). Particulate emissions from each mixer are controlled by a baghouse identified as BH3, which exhausts inside the building. LSR Mixer #4 was constructed in 2005; all other mixers were constructed in 2004.

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

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

**D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]**

In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the total VOC generating material input to each of the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation), including their associated clean-up activities, shall be limited such that the VOC emissions from each facility shall not exceed 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

**D.1.2 FESOP Limits [326 IAC 2-8]**

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

- (a) The input of each individual HAP generating material to the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation), including their associated clean-up activities, shall be limited such that the combined emissions of any single HAP shall not exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit will limit source-wide individual HAP emissions to less than 10 tons per twelve (12) consecutive month period.
- (b) The total HAP generating material input to the mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation), including their associated clean-up activities, shall be limited such that the combined emissions of total HAP shall not exceed 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit will limit source-wide total HAP emissions to less than 25 tons per twelve (12) consecutive month period.
- (c) The total VOC generating material input to the mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation), including their associated clean-up activities, shall be limited such that the total emissions of VOC from the mixing operations shall not exceed 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit will limit source-wide total VOC emissions to less than 100 tons per twelve (12) consecutive month period.
- (d) The allowable PM10 emission rate from each mixing process shall be limited by the following:

Mixer #	Description	Control Description	PM10 Limit (lbs/hr)
1	Mixer #1 (Mixing Process 2)	BH2	1.15
2	Mixer #2 (Mixing Process 3)	BH2	1.15
3	Mixer #3 (Mixing Process 1)	BH2	0.89
4	Compounding Mixer #4	BH5	0.51
6	Compounding Mixer #6	BH5	1.52
9	Compounding Mixer #9	BH5	0.86
10	Compounding Mixer #10	BH7	6.42
11	Compounding Mixer #11	BH2	0.54
12	Compounding Mixer #12	BH5	4.03
LSR 1	LSR Mixer #1	BH3	1.66
LSR 2	LSR Mixer #2	BH3	0.45
LSR 3	LSR Mixer #3	BH3	0.55
LSR 4	LSR Mixer #4	BH3	0.45
Silo	Material Loading	Bin Filter	2.54

Compliance with these limits will render 326 IAC 2-7 not applicable.

**D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]**

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) from the following units shall be limited by the equation following this table:

Mixer #	Description
1	Mixer #1 (Mixing Process 2)
2	Mixer #2 (Mixing Process 3)
3	Mixer #3 (Mixing Process 1)
4	Compounding Mixer #4
6	Compounding Mixer #6
9	Compounding Mixer #9
10	Compounding Mixer #10
11	Compounding Mixer #11
12	Compounding Mixer #12
LSR 1	LSR Mixer #1
LSR 2	LSR Mixer #2
LSR 3	LSR Mixer #3
LSR 4	LSR Mixer #4
Silo	Material Loading

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

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

- (b) Pursuant to 326 IAC 6-3-2(e)(2), the potential PM emissions from Mixer #11 and Mixer LSR 3 shall be less than 0.551 pounds per hour.

The process weight rates are considered confidential; therefore, the individual limitations are included in an IDEM, OAQ confidential file.

**D.1.4 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 mixing processes identified as Mixing Process #1, Mixing Process #2, Mixing Process #3, Mixer #11, LSR Mixer #1, LSR Mixers #2 and LSR Mixer #4 and the control devices identified as BH2 and BH3.

**Compliance Determination Requirements**

**D.1.5 Particulate Control**

In order to comply with Condition D.1.3, the baghouses identified as BH2 and BH3 for particulate control shall be in operation and control emissions at all times when filler material is being added to a mixer or when filler material is being blended into a mix.

**D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutant (HAP) Emissions Determination**  
 Compliance with Conditions D.1.1 and D.1.2 shall be determined by calculating the VOC and

HAP emissions associated with each mixing operations using the following equation:

$$E = \sum_{i=1}^{i=n} [P_i \times EF_i \times 1 / 2000]$$

where:

E = Total HAP or VOC emissions in tons

i = Single HAP or VOC producing material

P = Usage of HAP or VOC producing material in pounds

EF = HAP or VOC generation rate for each HAP or VOC producing material (pounds HAP and/or VOC generated per pound of ingredient) as determined by empirical calculations.

The total VOC and HAP emissions (ton/month) from mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation) is equal to the sum of the VOC and HAP emissions associated with each mixer.

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

#### **D.1.7 Visible Emissions Notations**

---

- (a) Daily visible emission notations of the baghouses identified as BH2 and BH3 shall be performed during normal daylight operations when the mixing processes 1, 2, and 3, and the compounding operation are in operation and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (b) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### **D.1.8 Parametric Monitoring**

---

The Permittee shall record the pressure drop across the baghouses (identified as BH2 and BH3) used in conjunction with the process, at least once per day when the process is in operation and exhausting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

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

### D.1.9 Record Keeping Requirements

---

- (a) To document compliance with Conditions D.1.1 and D.1.2 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The total weight of each VOC generating material used at each mixing process 1, 2, and 3, and the compounding operation each calendar month; and emissions of VOC each calendar month, as determined utilizing the equation specified in Condition D.1.6. Records shall indicate the specific mixing operation where the material was used except as provided in paragraph (2) below.
- (2) The total VOC generating material input and the emissions of VOC for each compliance period. If the combined emissions of VOC in the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation) is less than 25 tons per twelve (12) consecutive month period, the Permittee may document compliance with Condition D.1.1 using a combined total for the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation).
- (3) The total weight of each HAP generating material used by mixing processes 1, 2, and 3, and the compounding operation each calendar month; and emissions of individual and total HAPs each calendar month, as determined utilizing the equation specified in Condition D.1.6.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of daily visible emission notations of the baghouses identified as BH2 and BH3 once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling the process. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### D.1.10 Reporting Requirements

---

- (a) A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) If the combined VOC emissions from the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation) including associated clean-up activities, are less than 25 tons per twelve (12) consecutive month period, the Permittee

may document compliance with Conditions D.1.1 and D.1.2(c) using a combined total for the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Two (2) recirculating self-contained parts washer dip tanks. These degreasing operations do not exceed 145 gallons per 12 months; including
- (1) One (1) degreasing operation is located in the Maintenance Area and was constructed after 1990 [326 IAC 8-3-2][326 IAC 8-3-5].
  - (2) One (1) degreasing operation is located in the Custom LSR Area and was constructed after 1990 [326 IAC 8-3-2][326 IAC 8-3-5].

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

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the Permittee shall operate the degreasing operations in compliance with the following:

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

#### D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38<sup>o</sup>C) (one hundred degrees Fahrenheit (100<sup>o</sup>F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at

thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for cold cleaning facility construction of which commenced after July 1, 1990, the Permittee 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.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

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

Source Name: Momentive Performance Materials USA Inc.  
Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738  
FESOP Permit No.: F033-22847-00075

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) \_\_\_\_\_
- Report (specify) \_\_\_\_\_
- Notification (specify) \_\_\_\_\_
- Affidavit (specify) \_\_\_\_\_
- Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Momentive Performance Materials USA Inc.  
Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738  
FESOP Permit No.: F033-22847-00075

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

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

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

Page 2 of 2

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

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

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

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

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

A certification is not required for this report.

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

### FESOP Quarterly Report

Source Name: Momentive Performance Materials USA Inc.  
 Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
 Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738  
 FESOP Permit No.: F033-22847-00075  
 Facility: Mixing process 1  
 Parameter: Total VOC emissions  
 Limit: The total VOC generating material input to Mixing process 1, including associated clean-up activities, shall be limited such that the emissions of VOC shall not exceed 25 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

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

Attach a signed certification to complete this report.

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

### FESOP Quarterly Report

Source Name: Momentive Performance Materials USA Inc.  
 Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
 Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738  
 FESOP Permit No.: F033-22847-00075  
 Facility: Mixing process 2  
 Parameter: Total VOC emissions  
 Limit: The total VOC generating material input to Mixing process 2, including associated clean-up activities, shall be limited such that the emissions of VOC shall not exceed 25 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

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

Attach a signed certification to complete this report.

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

### FESOP Quarterly Report

Source Name: Momentive Performance Materials USA Inc.  
 Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
 Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738  
 FESOP Permit No.: F033-22847-00075  
 Facility: Mixing process 3  
 Parameter: Total VOC emissions  
 Limit: The total VOC generating material input to Mixing process 3, including associated clean-up activities, shall be limited such that the emissions of VOC shall not exceed 25 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

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

Attach a signed certification to complete this report.

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

### FESOP Quarterly Report

Source Name: Momentive Performance Materials USA Inc.  
 Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
 Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738  
 FESOP Permit No.: F033-22847-00075  
 Facility: Compounding operation  
 Parameter: Total VOC emissions  
 Limit: The total VOC generating material input to the compounding operation, including associated clean-up activities, shall be limited such that the emissions of VOC shall not exceed 25 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

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

Attach a signed certification to complete this report.

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

### FESOP Quarterly Report

Source Name: Momentive Performance Materials USA Inc.  
 Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
 Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738  
 FESOP Permit No.: F033-22847-00075  
 Facility: The four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation)  
 Parameter: Total VOC emissions  
 Limit: The total VOC generating material input to the mixing operations (identified as mixing processes 1, 2, and 3 and the compounding operation), including their associated clean-up activities, shall be limited such that the emissions of shall not exceed 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

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

Attach a signed certification to complete this report.

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

### FESOP Quarterly Report

Source Name: Momentive Performance Materials USA Inc.  
 Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
 Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738  
 FESOP Permit No.: F033-22847-00075  
 Facility: The four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation)  
 Parameter: Total HAP emissions  
 Limit: The total HAP emissions from the mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation), including their associated clean-up activities, shall be limited such that the combined emissions of total HAP shall not exceed 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

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

Attach a signed certification to complete this report.

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

### FESOP Quarterly Report

Source Name: Momentive Performance Materials USA Inc.  
 Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
 Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738  
 FESOP Permit No.: F033-22847-00075  
 Facility: The four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation)  
 Parameter: The individual HAP emissions  
 Limit: The individual HAP emissions from the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation), including their associated clean-up activities, shall be limited such that the combined emissions of any single HAP shall not exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION  
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Momentive Performance Materials USA Inc.  
 Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
 Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738  
 FESOP Permit No.: F033-22847-00075

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

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

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

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

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

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

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

Attach a signed certification to complete this report.

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

Technical Support Document (TSD) for an Administrative Amendment to a  
FESOP Operating Permit

**Source Background and Description**

Source Name:	Momentive Performance Materials USA Inc.
Source Location:	420 North Taylor Road, Garrett, Indiana 46738
County:	DeKalb
SIC Code:	3069
Operation Permit No.:	F033-22847-00075
Permit Issuance Date:	January 22, 2008
Administrative Amendment No.:	033-25973-00075
Permit Reviewer:	ERG/BL

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) has reviewed permit change requests from Momentive Performance Materials USA Inc. relating to the operation of a customized and specialty silicone elastomers manufacturing operation.

**History and Background**

Momentive Performance Materials USA Inc. (Momentive) was issued FESOP operating permit F033-22847-00075 on January 22, 2008 for a customized and specialty silicone elastomers manufacturing operation. On January 22, 2008 OAQ received a letter from Momentive requesting certain changes to its permit.

Momentive has filed a Petition for Administrative Review of the FESOP Permit that was issued on January 22, 2008 as Case No. 08-A-J-4062 (Permit Appeal). The Permit Appeal identifies conditions which Momentive contends OAQ did not review or consider Momentive's comments. Changes to address certain of these conditions are included in this Administrative Amendment.

**Explanation of Modification**

The source proposes several changes to its FESOP in order to provide more accurate descriptions of existing equipment, and clarify other permit terms and conditions. These changes are discussed in the Proposed Changes section below.

**Justification for the Modification**

The FESOP Operating permit is being modified through an Administrative Amendment to the source's FESOP Operating Permit. This modification is being performed pursuant to 326 IAC 2-8-10(a)(6) because the modification involves the revision of descriptive information where the revisions will not trigger a new requirement or violate an existing permit term.

### State Rule Applicability Determination

State rules and compliance monitoring applicabilities shall remain unchanged as a result of this administrative amendment.

### Recommendation

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

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

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

### Proposed Changes

The changes listed below have been made to FESOP No. 033-22847-00075. Deleted language is shown in ~~strikeout~~, new language appears in **bold**. The Table of Contents has been updated as necessary.

1. Momentive believes that it is only necessary to list insignificant activities that have applicable requirements in Condition A.3. The insignificant activities list includes "closed loop heating and cooling systems" and "one (1) laboratory", which have no applicable requirements. Momentive requests that descriptions for insignificant activities that have no applicable requirements be removed from this condition.

Response:

Pursuant to 326 IAC 2-8-3(c)(3), section A.3 should include both regulated and unregulated insignificant activities. No change to the permit was made based on this comment.

2. The two parts washers which are included in this section are small units which are leased from outside suppliers to Momentive. As such, these units are periodically replaced with like-kind units by the supplier. Momentive does not believe that it is necessary to identify the size of these units or the dates of construction for these units, since the units may change from time-to-time. Momentive requests that the words "30-gallon" be removed and that the dates of construction be removed. In the event that IDEM determines that the dates for these units will remain in the permit, Momentive requests that the construction dates for both units be changed to 2008, as the units were just replaced this month with 45-gallon units.

Response:

The following changes have been made to the permit as a result of this request:

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

This stationary source also includes the following insignificant activities:

- (a) Two (2) ~~30-gallon~~ recirculating, self-contained parts washer dip tanks. These degreasing operations do not exceed 145 gallons per 12 months; including
  - (1) One (1) degreasing operation is located in the Maintenance Area and was constructed ~~on or before 1999 and modified in 2004~~ **after 1990** [326 IAC 8-3-2][326 IAC 8-3-5].
  - (2) One (1) degreasing operation is located in the Custom LSR Area and was constructed ~~in 2005~~ **after 1990** [326 IAC 8-3-2][326 IAC 8-3-5].

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

- (a) Two (2) ~~30-gallon~~ recirculating, self-contained parts washer dip tanks. These degreasing operations do not exceed 145 gallons per 12 months; including
- (1) One (1) degreasing operation is located in the Maintenance Area and was constructed ~~on or before 1999 and modified in 2004~~ **after 1990** [326 IAC 8-3-2][326 IAC 8-3-5].
- (2) One (1) degreasing operation is located in the Custom LSR Area and was constructed ~~in 2005~~ **after 1990** [326 IAC 8-3-2][326 IAC 8-3-5].

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

3. The limit expressed in Condition C.1 (Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]) does not identify any specific emission units to which it applies and is contained in Indiana Air Pollution Control Board rules. Momentive knows of no reason for this requirement to be called out specifically. Momentive believes that the inclusion of this portion of the rule implies that IDEM has determined that there are specific emission units (beyond equipment contained in D Sections of the permit) to which it applies. Momentive requests that this condition be deleted.

Response:

Condition C.1 is a general source requirement and applies to any equipment that may be subject to a 326 IAC 6-3 pound per hour particulate emission limitation that is not specifically covered under Section D.1 or D.2. The condition will not be removed as a result of this comment.

4. Momentive requests that Condition C.8 (Performance Testing [326 IAC 3-6]) be reworded to read "All **required** testing shall be performed according to the provisions of 326 IAC 3-6 ...".

Momentive also requests that Condition C.15 (Actions Related to Noncompliance Demonstrated by a Stack Test) be removed in its entirety. The permit contains no stack test requirements, so requirements related to the failure of a stack test are not necessary. In the event that IDEM requests a stack test from Momentive in the future, procedures for notification of a stack test failure may be set at that time.

Response:

It should be noted that Condition D.1.6 (Volatile Organic Compounds (VOC) and Hazardous Air Pollutant (HAP) Emissions Determination) contains an equation to determine actual HAP and VOC generation rate. If Momentive was to verify the empirical calculations and later wanted to use test results to calculate potential emissions for permitting purposes, department approval of test results would be more likely if the testing had been performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures). The following changes have been made to the permit as a result of this comment:

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

- (a) All **required** 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).

...

5. Momentive requests that Condition C.14 (Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]) paragraph (d) be removed from the permit, as it is a statement of legal consequence, not a requirement upon Momentive. In the event that this condition is retained in the permit, Momentive requests that it be reworded as follows: "Failure to take reasonable response steps shall **may** be considered **evidence of** a deviation from the permit."

Response:

The intent of this condition is to clarify that a Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation. An excursion from compliance monitoring parameters, such as identified in Conditions D.1.4 and D.1.5 of this permit, is not a deviation. No change to the permit was made based on this comment.

6. Momentive requests that the introductory sentence to Condition C.18 (Compliance with 40 CFR 82 and 326 IAC 22-1) be reworded as follows: "... the Permittee shall comply with ~~the~~ **applicable** standards for recycling and emissions reduction **which may include:**"

Response:

40 CFR 82 regulates the handling of ozone-depleting substances, such as Freon, in a variety of processes and products including domestic and commercial refrigeration and air-conditioning units and portable fire extinguishers. Most sources include one or more subject units. Maintenance or repair of such units has the potential to release substances controlled under these rules. The following changes have been made to the permit as a result of this comment:

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

7. Momentive requests that Condition D.1.1 (Volatile Organic Compounds (VOC) [326 IAC 8-1-6]) refer to actual emissions not potential to emit. The condition should be reworded as follows: "... shall be limited such that ~~the potential to emit (PTE)~~ **emissions** from each facility shall not exceed 25 tons ...."

Response:

The following changes have been made to the permit as a result of this comment:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

In order to render the requirements of 326 IAC 8-1-6 (BACT) not applicable, the total VOC generating material input to each of the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation), including their associated clean-up activities, shall be limited such that the ~~potential to emit (PTE)~~ **VOC emissions** from each facility shall not exceed 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.1.2 FESOP Limits [326 IAC 2-8]

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

- (a) The input of each individual HAP generating material to the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation), including their associated clean-up activities, shall be limited such that the combined ~~potential to emit (PTE)~~ **emissions of** any single HAP shall not exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit will limit source-wide individual HAP emissions to less than 10 tons per twelve (12) consecutive month period.
- (b) The total HAP generating material input to the mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation), including their associated clean-up activities, shall be limited such that the combined ~~potential to emit (PTE)~~ **emissions of** total HAP shall not exceed 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit will limit source-wide total HAP emissions to less than 25 tons per twelve (12) consecutive month period.
- (c) The total VOC generating material input to the mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation), including their associated clean-up activities, shall be limited such that the total ~~potential to emit (PTE)~~ **emissions of** VOC from the mixing operations shall not exceed 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit will limit source-wide total VOC emissions to less than 100 tons per twelve (12) consecutive month period.

...

D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutant (HAP) Emissions Determination

Compliance with Conditions D.1.1 and D.1.2 shall be determined by calculating the VOC and HAP emissions associated with each mixing operations using the following equation:

$$E = \sum_{i=1}^{i=n} [P_i \times EF_i \times 1 / 2000]$$

where:

E = Total HAP or VOC ~~potential to emit~~ **emissions** in tons

i = Single HAP or VOC producing material

P = Usage of HAP or VOC producing material in pounds

EF = HAP or VOC generation rate for each HAP or VOC producing material (pounds HAP and/or VOC generated per pound of ingredient) as determined by empirical calculations.

The total VOC and HAP emissions (ton/month) from mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation) is equal to the sum of the VOC and HAP emissions associated with each mixer.

...  
**D.1.9 Record Keeping Requirements**

---

(a) To document compliance with Conditions D.1.1 and D.1.2 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

...  
(2) The total VOC generating material input and the ~~potential to emit (PTE)~~ **emissions of VOC** for each compliance period. If the combined ~~PTE emissions~~ **emissions of VOC** in the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation) is less than 25 tons per twelve (12) consecutive month period, the Permittee may document compliance with Condition D.1.1 using a combined total for the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation).

...  
**D.1.10 Reporting Requirements**

---

(a) A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) If the combined VOC ~~usage in~~ **emissions from** the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation) including associated clean-up activities, ~~is are~~ less than 25 tons per twelve (12) consecutive month period, the Permittee may document compliance with Conditions D.1.1 and D.1.2(c) using a combined total for the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation).

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

**FESOP Quarterly Report**

Source Name: Momentive Performance Materials USA Inc.  
Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738  
FESOP Permit No.: F033-22847-00075  
Facility: Mixing process 1  
Parameter: Total VOC ~~generating material input~~ **emissions**  
Limit: The total VOC generating material input to Mixing process 1, including associated clean-up activities, shall be limited such that the ~~potential to emit (PTE)~~ **emissions of VOC** shall not exceed 25 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

...

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

**FESOP Quarterly Report**

Source Name: Momentive Performance Materials USA Inc.  
Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738  
FESOP Permit No.: F033-22847-00075  
Facility: Mixing process 2  
Parameter: Total VOC ~~generating material input~~ **emissions**  
Limit: The total VOC generating material input to Mixing process 2, including associated clean-up activities, shall be limited such that the ~~potential to emit (PTE)~~ **emissions of VOC** shall not exceed 25 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

...

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

**FESOP Quarterly Report**

Source Name: Momentive Performance Materials USA Inc.  
Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738  
FESOP Permit No.: F033-22847-00075  
Facility: Mixing process 3  
Parameter: Total VOC ~~generating material input~~ **emissions**  
Limit: The total VOC generating material input to Mixing process 3, including associated clean-up activities, shall be limited such that the ~~potential to emit (PTE)~~ **emissions of VOC** shall not exceed 25 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

...

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

**FESOP Quarterly Report**

Source Name: Momentive Performance Materials USA Inc.  
Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738  
FESOP Permit No.: F033-22847-00075  
Facility: Compounding operation  
Parameter: Total VOC ~~generating material input~~ **emissions**  
Limit: The total VOC generating material input to the compounding operation, including associated clean-up activities, shall be limited such that the ~~potential to emit (PTE)~~ **emissions of VOC** shall not exceed 25 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

...

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

**FESOP Quarterly Report**

Source Name: Momentive Performance Materials USA Inc.  
Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738  
FESOP Permit No.: F033-22847-00075  
Facility: The four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation)  
Parameter: Total VOC ~~generating material input~~ **emissions**  
Limit: The total VOC generating material input to the mixing operations (identified as mixing processes 1, 2, and 3 and the compounding operation), including their associated clean-up activities, shall be limited such that the ~~potential to emit (PTE)~~ **emissions of** shall not exceed 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

...

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

**FESOP Quarterly Report**

Source Name: Momentive Performance Materials USA Inc.  
Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738  
FESOP Permit No.: F033-22847-00075  
Facility: The four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation)  
Parameter: Total HAP ~~generating material input~~ **emissions**  
Limit: The total HAP ~~generating material input to~~ **emissions from** the mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation), including their associated clean-up activities, shall be limited such that the combined ~~potential to emit (PTE)~~ **emissions of** total HAP shall not exceed 24 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

...

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

**FESOP Quarterly Report**

Source Name: Momentive Performance Materials USA Inc.  
Source Address: 420 North Taylor Road, Garrett, Indiana 46738  
Mailing Address: 420 North Taylor Road, Garrett, Indiana 46738  
FESOP Permit No.: F033-22847-00075  
Facility: The four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation)  
Parameter: The ~~input of each individual HAP generating material~~ **emissions**  
Limit: The ~~input of each individual HAP generating material to~~ **emissions from** the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation), including their associated clean-up activities, shall be

limited such that the combined ~~potential to emit (PTE)~~ **emissions** of any single HAP shall not exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

...

8. The table included in Condition D.1.2(d) indicates that Compounding Mixers #6, #10, and #12 are each controlled by both BH5 and BH7. Momentive requests that the control equipment designations contained in this table be changed to BH5 only for Compounding Mixer #6, BH7 only for Mixer #10, and BH5 only for Compounding Mixer #12.

Response:

The following changes have been made to the permit as a result of this comment:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

...

- (d) One (1) batch mixing operation, identified as compounding, including ten (10) mixing processes:

...

- (3) Three (3) mixers with a nominal mixer volume of 50, 300, and 500 gallons, identified as Mixer #6, Mixer #12, and Mixer #10 respectively. Particulate emissions from these mixers are controlled by two (2) baghouses identified as BH5 and BH7 operated for industrial hygiene purposes only, exhausting inside the building; Mixer #6 was constructed in 2002 **and exhausts to BH5**; Mixer #10 was constructed in 2003 **and exhausts to BH7**; and Mixer #12 was constructed in 2006 **and exhausts to BH5**. Mixing operations include two (2) bag dump stations and two (2) bulk bag unloading units.

...

**SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

One (1) polydimethylsiloxane mixing operation consisting of one (1) 60,000 pound bulk storage silo, constructed in 2002, and:

...

- (d) One (1) batch mixing operation, identified as compounding, including ten (10) mixing processes:

...

- (3) Three (3) mixers with a nominal mixer volume of 50, 300, and 500 gallons, identified as Mixer #6, Mixer #12, and Mixer #10 respectively. Particulate emissions from these mixers are controlled by two (2) baghouses identified as BH5 and BH7 operated for industrial hygiene purposes only, exhausting inside the building; Mixer #6 was constructed in 2002 **and exhausts to BH5**; Mixer #10 was constructed in 2003 **and exhausts to BH7**; and Mixer #12 was constructed in 2006 **and exhausts to BH5**. Mixing operations include two (2) bag dump stations and two (2) bulk bag unloading units.

...

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

...  
 D.1.2 FESOP Limits [326 IAC 2-8]

---

Pursuant to 326 IAC 2-8-4 (FESOP), the Permittee shall comply with the following:

- ...  
 (d) The allowable PM10 emission rate from each mixing process shall be limited by the following:

Mixer #	Description	Control Description	PM10 Limit (lbs/hr)
1	Mixer #1 (Mixing Process 2)	BH2	1.15
2	Mixer #2 (Mixing Process 3)	BH2	1.15
3	Mixer #3 (Mixing Process 1)	BH2	0.89
4	Compounding Mixer #4	BH5	0.51
6	Compounding Mixer #6	BH5 and BH7	1.52
9	Compounding Mixer #9	BH5	0.86
10	Compounding Mixer #10	<del>BH5 and BH7</del>	6.42
11	Compounding Mixer #11	BH2	0.54
12	Compounding Mixer #12	BH5 and BH7	4.03
LSR 1	LSR Mixer #1	BH3	1.66
LSR 2	LSR Mixer #2	BH3	0.45
LSR 3	LSR Mixer #3	BH3	0.55
LSR 4	LSR Mixer #4	BH3	0.45
Silo	Material Loading	Bin Filter	2.54

9. Momentive requests that the reference to “each mixing process” be removed from Condition D.1.4 (Preventive Maintenance Plan [326 IAC 2-8-4(9)]). Baghouses BH5 and BH7 are operated for industrial hygiene purposes. Five (5) mixers (Mixer #4, Mixer #9, Mixer #6, Mixer #12, and Mixer #10) exhaust to baghouses BH5 and BH7. The requirement to prepare a Preventive Maintenance Plan for these five (5) mixers is unlikely to have an impact on air emissions. Baghouses BH5 and BH7 are not “control devices” as referenced in Indiana Rule 326 IAC 1-6-3.

Response:

The following changes have been made to the permit as a result of this comment:

D.1.4 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 each mixing processes **identified as Mixing Process #1, Mixing Process #2, Mixing Process #3, Mixer #11, LSR Mixer #1, LSR Mixers #2 and LSR Mixer #4** and the control devices identified as BH2 and BH3.

10. Momentive requests that the phrase “solid material” be removed from Condition D.1.5 (Particulate Control) in two places and replaced with the word “filler”. There are occasions when dry ice will be added to a mix. The dust collection systems are not used during these occasions, as dry ice does not lead to the potential for particulate matter emissions. In addition, the phrase “blended into a mixer” at the end of this condition should be changed to read “blended into the mix”. These changes will make the condition more specific to Momentive’s manufacturing processes and will remove any ambiguity concerning requirements for operation of the dust collection systems during addition or blending solid or semi-solid materials that do not create dust during handling.

Response:

The following changes have been made to the permit as a result of this comment:

**D.1.5 Particulate Control**

---

In order to comply with Condition D.1.3, the baghouses identified as BH2 and BH3 for particulate control shall be in operation and control emissions at all times when ~~solid filler~~ material is being added to a mixer or when ~~solid filler~~ material is being blended into a mixer.

11. Baghouse BH3 exhausts indoors, therefore the requirements for visible emissions notations and parametric monitoring are unnecessary. Momentive requests that the phrase “and exhausting to the atmosphere” be added to the end of the first sentence of Condition D.1.7 (Visible Emissions Notations) and to the end of the first sentence of Condition D.1.8 (Parametric Monitoring).

Response:

In order to clarify the requirements in the permit, IDEM, OAQ has revised the Compliance Monitoring Requirements as follows:

**D.1.7 Visible Emissions Notations**

---

- (a) Daily visible emission notations of the baghouses identified as BH2 and BH3 shall be performed during normal daylight operations when the mixing processes 1, 2, and 3, and the compounding operation are in operation **and exhausting to the atmosphere**. A trained employee shall record whether emissions are normal or abnormal.

...

**D.1.8 Parametric Monitoring**

---

The Permittee shall record the pressure drop across the baghouses (identified as BH2 and BH3) used in conjunction with the process, at least once per day when the process is in operation **and exhausting to the atmosphere**. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

12. Momentive requests that the second paragraph of Condition D.1.8 (Parametric Monitoring) be reworded to read: “... shall ~~be subject to approval by IDEM, OAQ, and~~ shall be calibrated **in accordance with manufacturer’s recommendations as specified by good engineering practice** at least once ~~every six (6) months~~ **annually**.”

Response:

Compliance monitoring conditions are in the permit in order to ensure continuous compliance with the requirements. Pressure drop is an indicator of a variety of conditions within the baghouse. Any deviations from the normal operational range of the unit, whether gradual or sudden, should alert the operator that the unit needs maintenance. Both gradual and sudden changes in the pressure drop could result in damage to the bags or baghouse if not properly addressed. In order for these monitoring requirements to be effective, the pressure drop readings must be taken using an instrument that is accurate. IDEM believes that calibrating the instrument once every six (6) months is necessary to ensure the accuracy of the pressure drop measurements. Therefore, this condition has not been changed.

13. Momentive requests that paragraphs (a)(1) and (a)(3) of Condition D.1.9 (Record Keeping Requirements) be modified as these paragraphs reference the use of the equation specified in Condition D.1.6; however, the equation is used to compute actual VOC and HAP emissions, not the total weight of each VOC and HAP generating material. Also, the second sentence in paragraph (a)(1) requires that weight records be maintained for each mixer, however Condition

D.1.9(a)(2) discusses circumstances under which emission records need only be maintained on a plant-wide basis. Momentive suggests rewording portions of this condition.

Response:

The following changes have been made to the permit as a result of this comment. IDEM has removed the record keeping requirement to document the specific mixing operation where HAP generating material is used:

#### D.1.9 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The total weight of each VOC generating material used at each mixing process 1, 2, and 3, and the compounding operation each calendar month; **and emissions of VOC each calendar month**, as determined utilizing the equation specified in Condition D.1.6. Records shall indicate the specific mixing operation where the material was used **except as provided in paragraph (2) below**.

(2) The total VOC generating material input and the ~~potential to emit (PTE)~~ **emissions of VOC** for each compliance period. If the combined ~~PTE emissions~~ **emissions of VOC** in the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation) is less than 25 tons per twelve (12) consecutive month period, the Permittee may document compliance with Condition D.1.1 using a combined total for the four (4) mixing operations (identified as mixing processes 1, 2, and 3, and the compounding operation).

(3) The total weight of each HAP generating material used by mixing processes 1, 2, and 3, and the compounding operation each calendar month; **and emissions of individual and total HAPs each calendar month**, as determined utilizing the equation specified in Condition D.1.6. ~~Records shall indicate the specific mixing operation where the material was used.~~

...

<b>Conclusion</b>
-------------------

This source shall be subject to the conditions of the attached Administrative Amendment No. 033-25973-00075.

The issuance of this Administrative Amendment does not affect those terms and conditions of the Permit which are the subject of the Permit Appeal that were not modified by this Administrative Amendment.