



# 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: April 15, 2008

RE: Perry Foam Products, Inc. / 157-26343-00080

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



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Joe Rounds  
Perry Foam Products, Inc.  
P.O. Box 6419  
Lafayette, IN 47903

April 15, 2008

Re: 157-26343-00080  
Fifth Notice-Only Change to  
MSOP No. 157-18141-00080

Dear Mr. Rounds:

Perry Foam Products, Inc. was issued a Minor Source Operating Permit (MSOP) No. M157-18141-00080 on February 2, 2004 for a flexible polyurethane foam casting plant, located at 2335 South 30<sup>th</sup> Street, Lafayette, IN 47903. On March 31, 2008, the Office of Air Quality (OAQ) received an application from the source relating to the construction and operation of a new foam machine that is of the same type as foam machines #3 and #14. The new foam machine will comply with the same applicable requirements and permit terms and conditions as the foam machines #3 and #14, and will not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 or 326 IAC 2-3. The potential to emit of the entire source continues to be less than the threshold levels specified in 326 IAC 2-7. The addition of the new unit to the permit is considered a notice-only change pursuant to 326 IAC 2-6.1-6(d)(13). Pursuant to the provisions of 326 IAC 2-6.1-6, the permit is hereby revised as follows with the deleted language as ~~strikeouts~~ and new language **bolded**.

- (a) The new foam machine was added to the description of emissions units in Section A.2 and Section D.1 as follows:

A.2 Emissions Units and Pollution Control Equipment Summary

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- (q) **One (1) two component, polyurethane foam machine, identified as Unit ID GPS1, approved for construction in 2008, with a maximum production rate of 3,873 pads per day, exhausting through one (1) stack ID GPS1.**

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (q) **One (1) two component, polyurethane foam machine, identified as Unit ID GPS1, approved for construction in 2008, with a maximum production rate of 3,873 pads per day, exhausting through one (1) stack ID GPS1.**

All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit. A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Renee Traivaranon, of my staff, at 317-234-5615 or 1-800-451-6027, and ask for extension 4-5615.

Sincerely/Original Signed By:

Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

Attachments

IC/rt

cc: File - Tippecanoe County  
U.S. EPA, Region V  
Tippecanoe County Health Department  
Air Compliance Section Inspector  
Permits Administration and Development



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## NEW SOURCE CONSTRUCTION PERMIT and MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Perry Foam Products, Inc.**  
**2335 South 30<sup>th</sup> Street**  
**Lafayette, Indiana 47903-6419**

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

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

Operation Permit No.: MSOP 157-18141-00080	
Original signed by:  Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: February 2, 2004  Expiration Date: February 2, 2009

First Notice-Only Change: 157-19939-00080, issued January 5, 2005  
Second Notice-Only Change: 157-19937-00080, issued January 6, 2005  
Third Notice-Only Change: 157-21261-00080, issued June 8, 2005  
Fourth Notice-Only Change: 157-24399-00080, issued May 2, 2007

Fifth Notice-Only Change: 157-26343-00080		Page Affected: Entire Permit
Issued by/Original Signed By:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: April 15, 2008  Expiration Date: February 2, 2009	

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## SECTION A

## SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary flexible polyurethane foam casting plant.

Source Address: 2335 South 30<sup>th</sup> Street, Lafayette, Indiana 47903  
Mailing Address: P.O. Box 6419, Lafayette, Indiana 47903-6419  
General Source Phone: (765) 474-3404  
SIC Code: 3086  
County Location: Tippecanoe  
Source Location Status: Attainment for all criteria pollutants  
Source Status: Minor Source Operating Permit  
Minor Source, under PSD Rules;  
Minor Source, Section 112 of the Clean Air Act  
Not 1 of 28 Source Categories

### A.2 Emissions Units and Pollution Control Equipment Summary

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

- (a) Five (5) two component, polyurethane foam machines, identified as Unit ID Nos. 1, 2, 3, 4, and 5, each constructed in 1984 (Unit #1), 1989 (Unit #5), 1991 (Units #2 and #3) and February 23, 1989 (Unit #4), each with a maximum production rate of 3,873 pads per day, each exhausting through one (1) stack ID #4 (Unit #5), ID #5 (Unit #1), ID #7 (Units #2 and #3), and ID #19 (Unit #4);
- (b) Two (2) two component, polyurethane foam machines, used in product development, identified as Unit ID Nos. 6 and 7, each constructed in 1992 and 1989, respectively, each with a maximum production rate of 100 pads per day, each exhausting through one (1) stack ID #13;
- (c) One (1) two component, polyurethane foam machine, identified as Unit ID #14, constructed in 1998, with a maximum production rate of 3,873 pads per day, exhausting through one (1) stack ID #20;
- (d) One (1) two component, elastomeric foam machine, identified as Unit ID #16, constructed in February 11, 1998, with a maximum production rate of 1731 pads per day, exhausting through one (1) stack ID #9;
- (e) One (1) automated hub assembly, identified as Unit ID #8, constructed in 1995, with a maximum usage rate of 1.33 pounds of adhesive per hour, exhausting to general ventilation (GV);
- (f) One (1) fabric roller coater, identified as Unit ID #9, used for the application of sealant to hook fabric products, constructed on November 7, 1985, with a maximum usage rate of 5 pounds of water-based adhesive per hour, exhausting through two (2) stacks ID # 10 and 11;
- (g) One (1) automated compounding operation, identified as Unit ID #10, with a maximum usage rate of 524 pounds per hour, exhausting through one (1) stack ID #8;
- (h) One (1) manual hub gluing station, identified as Unit ID #11, constructed in 1977, with a maximum usage rate of 1.33 pounds of adhesive per hour, exhausting through two (2) stacks ID #12 and 22;

- (i) The following fugitive emission source with individual HAP emissions below 1 ton per year and a combination of HAP emissions below 2.5 tons per year:
  - (1) Evaporation of the solvent carrier for the liquid mold release used on flexible and rigid foam molds, identified as unit #33;
- (j) One (1) natural gas-fired boiler for area heating, with a maximum heat input capacity of less than 1 million British thermal units (MMBtu) per hour, exhausting through stack #18;
- (k) A product line for gluing and masking operations, identified as Unit #17, exhausting through stack #21, consisting of the following units:
  - (1) One (1) low pressure canister manual sprayer; and
  - (2) One (1) spray booth.
- (l) Two (2) cold cleaner degreasing tanks, identified as Unit # 18 and Unit # 19, using Methylene Chloride as solvent.
- (m) One (1) Foam Mixing Line to produce varieties of product, such as surgical face masks; and polyurethane foam furniture cushion, and automobile interior parts, etc. This line will consist of the following emission units:
  - (1) One (1) Large Part Conveyor Line, identified as Unit #20: Edge Sweets FM, with the maximum capacity of 277 carrier per shift;
  - (2) One (1) Large Part Conveyor Line, identified as Unit #21: KraussMaffei FM, with the maximum capacity of 277 carrier per shift;
  - (3) One (1) Large Part Conveyor Line, identified as Unit #22: Spray Booth, with the maximum capacity of 540 carrier per shift, exhausting through stack ID #23; and
  - (4) One (1) natural gas-fired drying oven, with a maximum heat input capacity of 3.5 MMBtu per hour.
- (n) Process line LPC-2 consisting of the following:
  - (1) Two (2) urethane foam machines, identified as Units #30 and #31, each with a maximum production rate of 19.0 and 210.6 pounds of urethane parts per hour, respectively, each exhausting inside the building;
  - (2) One (1) spray booth, identified as Unit #32, using a maximum of 4.64 pounds of mold release per hour, using an air atomization spray application system, with side baffles for overspray control, exhausting through one (1) stack (Stack #28);
  - (3) One (1) natural gas-fired drying oven, identified as Unit #34, with a maximum heat input capacity of 0.3 MMBtu per hour, exhausting through one (1) stack (Stack #29);
- (o) Process line LPC-3 consisting of the following:
  - (1) Two (2) urethane foam machines, identified as Units #35 and #36, with a total maximum production rate of 222.6 pounds of urethane parts per hour, each exhausting inside the building;
  - (2) One (1) spray booth, identified as Unit #37, using a maximum of 9.07 pounds of mold release per hour, using an air atomization spray application system, with side baffles for overspray control, exhausting through one (1) stack (Stack #30);
  - (3) One (1) natural gas-fired drying oven, identified as Unit #38, with a maximum heat input capacity of 3.5 MMBtu per hour, exhausting through one (1) stack (Stack #31);
- (p) Process line LPC-4 consisting of the following:
  - (1) One (1) high pressure foam machine, identified as Unit #23, with a maximum production rate of 33.9 pounds of urethane parts per hour, exhausting inside the building;
  - (2) One (1) spray booth, identified as Unit #24, using a maximum of 3.15 pounds of mold release per hour, using an air atomization spray application system, with side baffles for overspray control, exhausting through one (1) stack (Stack #25).
- (q) One (1) two component, polyurethane foam machine, identified as Unit ID GPS1, approved for construction in 2008, with a maximum production rate of 3,873 pads per day, exhausting through one (1) stack ID GPS1.

## SECTION B GENERAL CONDITIONS

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

### B.1 Permit No Defense [IC 13]

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

### B.2 Definitions

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

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

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

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

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

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

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

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

### B.6 Modification to Permit [326 IAC 2]

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

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

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

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
  - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
  - (2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been

revised pursuant to 326 IAC 2-6.1-6 and an Operation Permit Validation Letter is issued.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7 (Fees).

**B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:  
  
Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, IN 46204-2251
- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**B.9 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an

additional ninety (90) days provided the Permittee notifies:

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

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

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.10 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

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

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
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.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

**B.11 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2]  
[IC 13-30-3-1][IC 13-17-3-2]**

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (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 processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) 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.12 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]**

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

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

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

**B.13 Annual Fee Payment [326 IAC 2-1.1-7]**

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

## SECTION C

## SOURCE OPERATION CONDITIONS

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

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

**C.2 Permit Revocation [326 IAC 2-1.1-9]**

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

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

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

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

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

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

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

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

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

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
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 2-7-1(34).

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

## Testing Requirements

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

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the 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.7 Compliance Requirements [326 IAC 2-1.1-11]

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

## Compliance Monitoring Requirements

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

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

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

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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.10 Actions Related to Noncompliance Demonstrated by a Stack Test

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- (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 emissions unit while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (a) 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 not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

### **Record Keeping and Reporting Requirements**

#### **C.11 Malfunctions Report [326 IAC 1-6-2]**

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

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

#### **C.12 General Record Keeping Requirements [326 IAC 2-6.1-5]**

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

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

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- (a) Reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

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

- (a) Five (5) two component, polyurethane foam machines, identified as Unit ID Nos. 1, 2, 3, 4, and 5, each constructed in 1984 (Unit #1), 1989 (Unit #5), 1991 (Units #2 and #3) and February 23, 1989 (Unit #4), each with a maximum production rate of 3,873 pads per day, each exhausting through one (1) stack ID #4 (Unit #5), ID #5 (Unit #1), ID #7 (Units #2 and #3), and ID #19 (Unit #4);
- (b) Two (2) two component, polyurethane foam machines, used in product development, identified as Unit ID Nos. 6 and 7, each constructed in 1992 and 1989, respectively, each with a maximum production rate of 100 pads per day, each exhausting through one (1) stack ID #13;
- (c) One (1) two component, polyurethane foam machine, identified as Unit ID #14, constructed in 1998, with a maximum production rate of 3,873 pads per day, exhausting through one (1) stack ID #20;
- (d) One (1) two component, elastomeric foam machine, identified as Unit ID #16, constructed in February 11, 1998, with a maximum production rate of 1731 pads per day, exhausting through one (1) stack ID #9;
- (e) One (1) automated hub assembly, identified as Unit ID #8, constructed in 1995, with a maximum usage rate of 1.33 pounds of adhesive per hour, exhausting to general ventilation (GV);
- (f) One (1) fabric roller coater, identified as Unit ID #9, used for the application of sealant to hook fabric products, constructed on November 7, 1985, with a maximum usage rate of 5 pounds of water-based adhesive per hour, exhausting through two (2) stacks ID # 10 and 11;
- (g) One (1) automated compounding operation, identified as Unit ID #10, with a maximum usage rate of 524 pounds per hour, exhausting through one (1) stack ID #8;
- (h) One (1) manual hub gluing station, identified as Unit ID #11, constructed in 1977, with a maximum usage rate of 1.33 pounds of adhesive per hour, exhausting through two (2) stacks ID #12 and 22;
- (i) The following fugitive emission source with individual HAP emissions below 1 ton per year and a combination of HAP emissions below 2.5 tons per year:
  - (1) Evaporation of the solvent carrier for the liquid mold release used on flexible and rigid foam molds, identified as unit #33;
- (j) One (1) natural gas-fired boiler for area heating, with a maximum heat input capacity of less than 1 million British thermal units (MMBtu) per hour, exhausting through stack #18;
- (k) A product line for gluing and masking operations, identified as Unit #17, exhausting through stack #21, consisting of the following units:
  - (1) One (1) low pressure canister manual sprayer; and
  - (2) One (1) spray booth.
- (l) Two (2) cold cleaner degreasing tanks, identified as Unit # 18 and Unit # 19, using Methylene Chloride as solvent.
- (m) One (1) Foam Mixing Line to produce varieties of product, such as surgical face masks; and polyurethane foam furniture cushion, and automobile interior parts, etc. This line will consist of the following emission units:
  - (1) One (1) Large Part Conveyor Line, identified as Unit #20: Edge Sweets FM, with the maximum capacity of 277 carrier per shift;
  - (2) One (1) Large Part Conveyor Line, identified as Unit #21: KraussMaffei FM, with the maximum capacity of 277 carrier per shift; and
  - (3) One (1) Large Part Conveyor Line, identified as Unit #22: Spray Booth, with the maximum capacity of 540 carrier per shift, exhausting through stack ID #23; and
  - (4) One (1) natural gas-fired drying oven, with a maximum heat input capacity of 3.5 MMBtu per hour.
- (n) Process line LPC-2 consisting of the following:
  - (1) Two (2) urethane foam machines, identified as Units #30 and #31, each with a maximum production rate of 19.0 and 210.6 pounds of urethane parts per hour, respectively, each exhausting inside the building;

- (2) One (1) spray booth, identified as Unit #32, using a maximum of 4.64 pounds of mold release per hour, using an air atomization spray application system, with side baffles for overspray control, exhausting through one (1) stack (Stack #28);
  - (3) One (1) natural gas-fired drying oven, identified as Unit #34, with a maximum heat input capacity of 0.3 MMBtu per hour, exhausting through one (1) stack (Stack #29);
  - (o) Process line LPC-3 consisting of the following:
    - (1) Two (2) urethane foam machines, identified as Units #35 and #36, with a total maximum production rate of 222.6 pounds of urethane parts per hour, each exhausting inside the building;
    - (2) One (1) spray booth, identified as Unit #37, using a maximum of 9.07 pounds of mold release per hour, using an air atomization spray application system, with side baffles for overspray control, exhausting through one (1) stack (Stack #30);
    - (3) One (1) natural gas-fired drying oven, identified as Unit #38, with a maximum heat input capacity of 3.5 MMBtu per hour, exhausting through one (1) stack (Stack #31);
  - (p) Process line LPC-4 consisting of the following:
    - (1) One (1) high pressure foam machine, identified as Unit #23, with a maximum production rate of 33.9 pounds of urethane parts per hour, exhausting inside the building;
    - (2) One (1) spray booth, identified as Unit #24, using a maximum of 3.15 pounds of mold release per hour, using an air atomization spray application system, with side baffles for overspray control, exhausting through one (1) stack (Stack #25).
  - (q) One (1) two component, polyurethane foam machine, identified as Unit ID GPS1, approved for construction in 2008, with a maximum production rate of 3,873 pads per day, exhausting through one (1) stack ID GPS1.
- (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards

#### D.1.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) the particulate matter emissions from the one (1) boiler, constructed after September 21, 1983, are limited to 0.6 lb/mmBtu.

#### D.1.2 Batch Cold Cleaning Machine Standards NESHAP [326 IAC 14 and 40 CFR Part 63.462, Subpart T]

Pursuant to National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14 and 40 CFR Part 63.462, Subpart T (Batch Cold Cleaning Machine Standards):

- (a) Each owner or operator of an immersion batch cold solvent cleaning machine shall comply with the following:
  - (1) Employ a tightly fitting cover that shall be closed at all times except during parts entry and removal, and a water layer at a minimum thickness of 2.5 cm (1.0 inch) on the surface of the solvent within the cleaning machine, or
  - (2) Employ a tightly fitting cover that shall be closed at all times except during parts entry and removal and a freeboard ratio of 0.75 or greater.
- (b) Each owner or operator of a remote-reservoir batch cold solvent cleaning machine shall employ a tightly fitting cover over the solvent sump that shall be closed at all times except during the cleaning of parts.
- (c) Each owner or operator of a batch cold cleaning machine shall comply with the work and operational practice requirements as follows:

- (1) All waste solvent shall be collected and stored on closed containers. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
- (2) If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.
- (3) The owner or operator shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.
- (4) The owner or operator shall ensure that the solvent level does not exceed the fill line.
- (5) Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of (C)(i) of this section.
- (6) When an air - or pump - agitated solvent bath is used, the owner or operator shall ensure that the agitator is operated to produce a rolling motion of the solvent but not observable splashing against tank walls or parts being cleaned.
- (7) The owner or operator shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.
- (8) Except as provided in paragraph (C)(ix) of this section, sponges, fabric, wood, and paper products shall not be cleaned.
- (9) The prohibition in paragraph (C)(viii) of this section does not apply to the cleaning of porous materials that are parts of polychlorinated biphenyl (PCB) laden transformers if those transformers are handled throughout the cleaning process and disposed of in compliance with an approved PCB disposal permit issued in accordance with the Toxic Substances Control Act.

#### D.1.3 Volatile Organic Compounds [326 IAC 8-1-1(b)]

Any change or modification which may increase the actual VOC emissions from the degreasing operations to greater than 15 pounds per day will be subject to 326 IAC 8-3 and must be approved by the Office of Air Quality (OAQ) before such change may occur.

#### D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The use of VOC, including coatings, dilution solvents, and cleaning solvents, in the spray booth, identified as Unit ID No. 37, shall be less than 25 tons per 12 consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.

#### D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Any change or modification which may increase the potential volatile organic compounds emissions to 25 tons per year or more from the equipment covered in this permit, other than Unit ID No. 37, must be approved by the Office of Air Quality (OAQ) before such change may occur.

#### D.1.6 Hazardous Air Pollutants

Any change or modification which may increase the single HAP emissions to 10 tons per year or 25 tons per year for a combination of HAPs from the equipment covered in this permit must be approved by the Office of Air Quality (OAQ) before such change may occur.

#### D.1.7 Preventive Maintenance Plan [326 IAC 1-6-3]

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

## Compliance Determination Requirements

### D.1.8 Volatile Organic Compounds (VOC)

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Compliance with the VOC content and usage limitations contained in Condition D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

### D.1.9 VOC Emissions

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Compliance with Condition D.1.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

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

There are no applicable compliance monitoring requirements for this source.

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

### D.1.10 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.3 through D.1.6, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.4 and to establish compliance with conditions D.1.3, D.1.5, and D.1.6. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) The total VOC, single HAP, and total HAPs usage for each month;
  - (3) The VOC usage for the degreasing operations each day; and
  - (4) The weight of VOCs, single HAP, and total HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### D.1.11 Reporting Requirements [40 CFR 63.468, Subpart T]

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Pursuant to 40 CFR 63.462(d), each owner or operator shall submit an initial notification report as described in 40 CFR 63.468(a) (for existing machines) and (b) (for new machines) and a compliance report as described in 40 CFR 63.468(c). Pursuant to 40 CFR 63.468 (b):

- (a) Each owner or operator of a new solvent cleaning machine shall submit an initial notification report to the Administrator. New sources for which the construction or reconstruction commenced after December 2, 1994, shall submit this report as soon as practicable before the construction or reconstruction is planned to commence. This report shall include all of the information required in 40 CFR 63.5(d)(1) of Subpart A (General Provisions), with the revisions and additions in paragraphs (a)(1) through (a)(3) of this section.

- (1) The report shall include a brief description of each solvent cleaning machine including machine type (batch vapor), batch cold, vapor in-line, or cold-line), solvent/air interface area, and existing controls.
  - (2) The report shall include the anticipated compliance approach for each solvent cleaning machine.
  - (3) In lieu of 40 CFR 63.5 (d)(1)(ii)(H) of subpart A of this part, the owner or operator must report an estimate of annual halogenated HAP solvent consumption for each solvent cleaning machine.
- (b) Each owner or operator of a batch cold solvent cleaning machine subject to the provisions of this subpart shall submit a compliance report to the Administrator. For new sources, this report shall be submitted to the Administrator no later than 150 days after startup, or May 1, 1995, whichever is later. This report shall include the following requirements:
- (1) The name and address of the owner or operator.
  - (2) The address (i.e. physical location) of the solvent cleaning machine(s).
  - (3) A statement, signed by the owner or operator of the solvent cleaning machine, stating that the solvent cleaning machine for which the report is being submitted is in compliance with the provisions of this subpart.
  - (4) The compliance approach for each solvent cleaning machine.

#### D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.4 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.

## Indiana Department of Environmental Management Office of Air Quality Compliance Data Section

### Quarterly Report

Company Name: Perry Foam Products, Inc.  
Location: 2335 South 30<sup>th</sup> Street, Lafayette, Indiana 47903  
Permit No.: MSOP 157-18141-00080  
Source: Spray Booth Unit No. 37  
Pollutant: Volatile Organic Compounds (VOC)  
Limit: The use of VOC, including coatings, dilution solvents, and cleaning solvents, in the spray booth, identified as Unit ID No. 37, shall be less than 25 tons per 12 consecutive month period with compliance determined at the end of each month.

Year: \_\_\_\_\_

Month	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	12 Month Total VOC Usage (tons)

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	<b>Perry Foam Products, Inc.</b>
<b>Address:</b>	<b>2335 South 30<sup>th</sup> Street</b>
<b>City:</b>	<b>Lafayette, Indiana 47903</b>
<b>Phone #:</b>	<b>(765) 474-3404</b>
<b>MSOP #:</b>	<b>157-18141-00080</b>

I hereby certify that Perry Foam Products, Inc. is

still in operation.

no longer in operation.

I hereby certify that Perry Foam Products, Inc. is

in compliance with the requirements of MSOP 157-18141-00080.

not in compliance with the requirements of MSOP 157-18141-00080.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FAX NUMBER - 317 233-5967**

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

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

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

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

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

COMPANY: Perry Foam Products, Inc. PHONE NO. (765) 474-3404  
LOCATION: (CITY AND COUNTY) Lafayette, Tippecanoe County  
PERMIT NO. 157-18141 AFS PLANT ID: 157-00080 AFS POINT ID: \_\_\_\_\_ INSP: Wanda Stanfield  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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Mail to: Permit Administration & Development Section  
Office Of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Perry Foam Products, Inc.  
P.O. Box 6419  
Lafayette, Indiana 47903-6419

**Affidavit of Construction**

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that Perry Foam Products, Inc., 2335 South 30<sup>th</sup> Street, Lafayette, Indiana 47903, completed construction of the new process lines LPC-2, LPC-3, and LPC-4 and their associated emission units on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on September 16, 2003 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. 157-18141, Plant ID No. 157-00080 issued on \_\_\_\_\_.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_.

My Commission expires:

Signature

Name (typed or printed)

**Appendix A: Emission Calculations**  
**VOC and HAP Emissions from a Foam Machine (GPS1)**

**Company Name:** Perry Foam Products, Inc.  
**Address City IN Zip:** 2335 South 30th Street, Lafayette, Indiana 47903-6419  
**MSOP No.:** 157-26343-00080  
**Reviewer:** Renee Traivaranon  
**Date:** April 7, 2008

Process	Pollutant	Maximum Usage (lb/hr)	* Emission Factor (lb/lb)	Emission Rate (lb/hour)	Uncontrolled Emissions (tons/year)
Foam Machine GSP1	2,4 Toluene Diisocyanate (TDI)	3.87	5.0E-05	1.94E-04	8.48E-04
	2,6 Toluene Diisocyanate	2.09	5.0E-05	1.05E-04	4.58E-04
	<u>Clean Up Solvents</u>				
	n-methyl pyrrolidine	11.79	0.007	0.08	0.36
	Dimethyl glutarate	3.66	0.007	0.03	0.11
	Dimethyl adipate	1.63	0.007	0.01	0.05
	Dimethyl succinate	1.63	0.007	0.01	0.05
<b>TOTAL VOC EMISSIONS</b>				<b>0.13</b>	<b>0.57</b>
<b>TOTAL HAP EMISSIONS</b>				<b>1.94E-04</b>	<b>8.5E-04</b>

**Methodology:**

Solvent emission factors used are the same as units #3 and #14 as indicated in the application.  
VOC/HAPs Emissions (tons/year) = Emission Rate (lb/hour) \* (1 ton/2000 lb) \* (8760 hour/1 year)