



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: November 25, 2008

RE: Johns Manville / 099-26867-00042

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Mr. Jason Hefner
Johns Manville
1215 West Dewey Street
Bremen, Indiana 46506

November 25, 2008

Re: 099-26867-00042
First Significant Revision to
F099-17832-00042

Dear Mr. Hefner:

Johns Manville was issued a Federally Enforceable State Operating Permit (FESOP) (Renewal) No. F099-17832-00042 on July 21, 2006 for a stationary rigid polyisocyanurate foam panel manufacturing source located at 1215 West Dewey Street, Bremen, Indiana 46506. On August 13, 2008, the Office of Air Quality (OAQ) received an application from the source requesting the option to not operate the RTO during the months of November, December, January, February, and March when the inline cutting process is operating. This request is in accordance with 326 IAC 8-1-2(a)(2) (Compliance Methods). As a result, the source has requested revisions to the existing VOC emission and throughput limits for the entire rigid polyisocyanurate foam panel manufacturing process (EU1 through EU4). The source has also requested that all references to the waste recycling process (EU5) be removed from the permit since this unit has been permanently shut down. Finally, Johns Manville has requested revisions to the emission unit descriptions and potential to emit calculations for the foam head (EU1), foaming laminator (EU2), inline cutting process (EU3), and the warehouse area (EU4). Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

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 Brian Williams, of my staff, at 317-234-5375 or 1-800-451-6027, and ask for extension 4-5375.

Original signed by,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

IC/BMW

cc: File - Marshall County

Johns Manville
Bremen, Indiana
Permit Reviewer: Brian Williams

Page 2 of 2
FESOP SPR No. 099-26867-00042

Marshall County Health Department
U.S. EPA, Region V
Air Compliance Section
IDEM Northern Regional Office
Compliance Data Section
Technical Support and Modeling
Permits Administrative and Development
Billing, Licensing and Training Section



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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

Johns Manville
1215 West Dewey Street
Bremen, Indiana 46506

(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 provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and 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.: F099-17832-00042	
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: July 21, 2006 Expiration Date: July 21, 2016
First Administrative Amendment No. F099-25710-00042, issued on January 22, 2008	

First Significant Permit Revision No: F099-26867-00042	
Original signed by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 25, 2008 Expiration Date: July 21, 2016

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary rigid polyisocyanurate foam panel manufacturing source.

Source Address:	1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address:	1215 West Dewey Street, Bremen, Indiana 46506
General Source Phone:	(574) 546-4666
SIC Code:	3086
County Location:	Marshall
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) foam head, identified as EU1, uncontrolled and exhausting to Stack 202, capacity: 78,000 board feet per hour.
- (b) One (1) foaming laminator, identified as EU2, uncontrolled and exhausting to Stack 201, capacity: 78,000 board feet per hour.
- (c) One (1) inline cutting process, identified as EU3, consisting of an edge trim saw, cross cut saw, and gang saw, exhausting to a dust collector system for particulate control equipped with a cyclone and baghouse, identified as PC1, which exhausts to a pre-filter dust collector, identified as PC2, which exhausts to a regenerative thermal oxidizer rated at 5.0 MMBtu/hr for VOC control, exhausting to Stack CD-1, capacity: 78,000 board feet per hour. The dust collector system consists of a cyclone and primary baghouse, identified as PC1, and a secondary pre-filter dust collector, identified as PC2, which is only utilized if and when the primary baghouse malfunctions.
- (d) One (1) foot slicer, identified as FS, equipped with a cyclone and baghouse dust collector system for particulate control which exhausts to a regenerative thermal oxidizer for VOC control, exhausting to Stack CD-1, capacity: 640 board feet per hour.
- (e) One (1) panel saw, identified as PS, equipped with a cyclone and baghouse dust collector system for particulate control which exhausts to a regenerative thermal oxidizer for VOC control, exhausting to Stack CD-1, capacity: 640 board feet per hour.
- (f) One (1) warehouse area, identified as EU4, consisting of curing, staging and shipping areas for the finished panels, capacity: 78,000 board feet per hour.

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, as defined in 326 IAC 2-7-1(21):

- (a) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - (2) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (b) Equipment used exclusively for the following: Packaging lubricants and greases, filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (c) Cleaners and solvents having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (d) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (e) Replacement or repair of bags in baghouses and filters in other air filtration equipment.
- (f) Heat exchanger cleaning and repair.
- (g) Process vessel degassing and cleaning to prepare for internal repairs.
- (h) Paved and unpaved roads and parking lots with public access.
- (i) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (j) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (k) One (1) Cricket saw, with particulate matter emissions less than 5 pounds per hour or 25 pounds per day. [326 IAC 6-3-2]
- (l) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP: Spray degreaser operation.
- (m) The following VOC storage tanks, with VOC emissions less than 3 pounds per hour or 15 pounds per day:
 - (1) Two (2) tanks, identified as Tank 1 and Tank 2, capacity: 8,661 gallons, each.
 - (2) Two (2) tanks, identified as Tank 3 and Tank 6, capacity: 5,294 gallons, each.
 - (3) Four (4) tanks, identified as Tank 4, Tank 5, Tank 7 and Tank 8, capacity: 5,640 gallons, each.

- (4) One (1) tank, identified as Tank 9, capacity: 5,434 gallons.
- (5) One (1) tank, identified as Tank 10, capacity: 1,316 gallons.
- (n) One (1) pressure vessel designed to operate in excess of 204.9 kPa and without emissions to the atmosphere, identified as Tank 11.
- (o) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
 - (1) Four (4) natural gas-fired make-up air heaters, with a maximum heat input capacity of 1.21 MMBtu/hr, each.
 - (2) Five (5) natural gas-fired thermocyclers, with a maximum heat input capacity of 0.4 MMBtu/hr, each.
 - (3) Two (2) natural gas-fired furnaces, with a maximum heat input capacity of 0.126 MMBtu/hr, each.
 - (4) Four (4) natural gas-fired thermocyclers, with a maximum heat input capacity of 0.58 MMBtu/hr, each.
 - (5) Three (3) natural gas-fired make-up air heaters, with a maximum heat input capacity of 0.75 MMBtu/hr, each.
 - (6) Three (3) natural gas-fired make-up air heaters, with a maximum heat input capacity of 0.972 MMBtu/hr, each.
 - (7) Two (2) natural gas-fired process furnaces, with a maximum heat input capacity of 1.5 MMBtu/hr, each.

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]

- (a) This permit, 099-17832-00042, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [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 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.6 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.7 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.8 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 the "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 re-

requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 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.10 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.11 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, IDEM, OAQ, may require to determine the compliance status of the source.

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(1).

B.12 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 the "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.13 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, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(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.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 099-17832-00042 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.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 Provision), 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 need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "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 FESOP 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 the "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 the "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) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this

existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
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 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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the 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), (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 Permit Revision 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] [IC13-30-3-1]

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] [IC 13-17-3-2]

- (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 the "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

Emissions 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 one hundred (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]

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 limitation shall also make 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) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) 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.

(d) 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(3)]

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

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

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

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "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. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.11 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 upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

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

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [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.14 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.15 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;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.17 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.18 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 the "authorized individual" as defined by 326 IAC2-1.1-1(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 the "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.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

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

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Foam panel manufacturing line

- (a) One (1) foam head, identified as EU1, uncontrolled and exhausting to Stack 202, capacity: 78,000 board feet per hour.
- (b) One (1) foaming laminator, identified as EU2, uncontrolled and exhausting to Stack 201, capacity: 78,000 board feet per hour.
- (c) One (1) inline cutting process, identified as EU3, consisting of an edge trim saw, cross cut saw, and gang saw, exhausting to a dust collector system for particulate control equipped with a cyclone and baghouse, identified as PC1, which exhausts to a pre-filter dust collector, identified as PC2, which exhausts to a regenerative thermal oxidizer rated at 5.0 MMBtu/hr for VOC control, exhausting to Stack CD-1, capacity: 78,000 board feet per hour. The dust collector system consists of a cyclone and primary baghouse, identified as PC1, and a secondary pre-filter dust collector, identified as PC2, which is only utilized if and when the primary baghouse malfunctions.
- (d) One (1) foot slicer, identified as FS, equipped with a cyclone and baghouse dust collector system for particulate control which exhausts to a regenerative thermal oxidizer for VOC control, exhausting to Stack CD-1, capacity: 640 board feet per hour.
- (e) One (1) panel saw, identified as PS, equipped with a cyclone and baghouse dust collector system for particulate control which exhausts to a regenerative thermal oxidizer for VOC control, exhausting to Stack CD-1, capacity: 640 board feet per hour.
- (f) One (1) warehouse area, identified as EU4, consisting of curing, staging and shipping areas for the finished panels, capacity: 78,000 board feet per hour.

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

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

D.1.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the inline cutting process (EU3) shall not exceed 12.44 pounds per hour when operating at a process weight rate of 10,485.24 pounds per hour (5.24 tons per hour).
- (b) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the panel saw (PS) shall not exceed 4.12 pounds per hour when operating at a process weight rate of 2,016 pounds per hour (1.008 tons per hour).

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

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

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

D.1.2 PSD and FESOP Limitations (PM, PM₁₀ and VOC) [326 IAC 2-2] [326 IAC 2-8-4]

- (a) PM and PM₁₀ emissions from the inline cutting process (EU3) shall not exceed 12.44 pounds per hour, equivalent to 54.49 tons per year.
- (b) PM and PM₁₀ emissions from the panel saw (PS) shall not exceed 4.12 pounds per hour, equivalent to 18.05 tons per year.
- (c) VOC emissions from the inline cutting process (EU3) shall not exceed 41.28 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (d) VOC emissions from the foam head (EU1) shall not exceed 0.0000669 pounds per board feet.
- (e) VOC emissions from the foaming laminator (EU2) shall not exceed 0.0001181 pounds per board feet.
- (f) Throughput for the entire polyisocyanurate foam panel manufacturing process (EU1 through EU4) shall not exceed 500,000,000 board feet per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits and the BACT limits in Condition D.1.3 will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply. These limitations shall also render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to SPR 099-14499-00042, issued October 16, 2001, and 326 IAC 8-1-6, BACT for the rigid polyisocyanurate foam panel manufacturing process has been determined to be:

- (a) A regenerative thermal oxidizer shall be in operation at all times that the inline cutting process (EU3) is in operation, with an overall control efficiency of 90%; except as specified in Condition D.1.3(c).
- (b) Throughput for the entire rigid polyisocyanurate foam panel manufacturing process (EU1 through EU4) shall not exceed 678,356,560 board feet per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) Pursuant to 326 IAC 8-1-2(a)(2), the RTO is not required to be in operation when the inline cutting process (EU3) is in operation during the months of November, December, January, February, and March.

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 these facilities and any control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compound (VOC) Emissions

Compliance with the VOC emission limitations contained in Condition D.1.2 shall be determined for each month using the quarterly reporting form located at the end of this permit. Compliance shall be based on the VOC emitted for the previous month added to the total VOC emitted for the previous 11 months, so as to arrive at the total VOC emitted for the most recent 12 consecutive month period.

- (a) When the RTO is in operation the VOC emissions from the inline cutting process (EU3) shall be calculated as follows:

$$\text{VOC}_{w/RTO} = (\text{EF} * \text{Y})$$

Where:

$\text{VOC}_{w/RTO}$ = VOC emissions with RTO control

EF = Emission Factor (0.0000179 lb VOC/bdft) or the emission factor determined from the most recent valid stack test

Y = Total rigid polyisocyanurate foam panel board feet manufactured per period

- (b) When the RTO is not in operation during the months of November, December, January, February, and March, the VOC emissions from the inline cutting process (EU3) shall be calculated as follows:

$$\text{VOC}_{w/o RTO} = (\text{EF} * \text{X})$$

Where:

$\text{VOC}_{w/o RTO}$ = VOC emissions without RTO control

EF = Emission Factor (0.000372 lb VOC/bdft) or the emission factor determined from the most recent valid stack test

X = Total board feet of rigid polyisocyanurate foam panels manufactured per period

- (c) Total VOC emissions for each compliance period shall be determined using the following equation:

$$\text{Total VOC Emissions} = \text{VOC}_{w/RTO} + \text{VOC}_{w/o RTO}$$

Where:

$\text{VOC}_{w/RTO}$ = VOC emissions with RTO control

$\text{VOC}_{w/o RTO}$ = VOC emissions without RTO control

D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.1.3(a), the Permittee shall perform VOC testing of the regenerative thermal oxidizer, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C-Performance Testing.

D.1.7 Particulate Control

- (a) In order to comply with Conditions D.1.1 and D.1.2, the cyclone and baghouse dust collector system for particulate control, identified as PC1, shall be in operation and control emissions from the inline cutting process (EU3), the foot slicer (FS) and the panel

saw (PS) at all times that the inline cutting process (EU3), the foot slicer (FS) and the panel saw (PS) are in operation.

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

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

D.1.8 Visible Emissions Notations

- (a) Visible emission notations of the inline cutting process (EU3) stack exhaust (Stack CD-1) shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.9 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the dust collector system used in conjunction with the inline cutting process (EU3), at least once per day when the inline cutting process (EU3) is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the primary baghouse is outside the normal range of 0.5 and 6.0 inches of water or a range established during the latest stack test, and the pressure drop across the secondary emergency dust collector is outside the normal range of 0.5 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.10 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the

event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.1.11 Cyclone Failure Detection

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

D.1.12 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as an hourly average, or shall be recorded continuously on a strip chart recorder. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature of 1400°F.
- (b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.3, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature as observed during the compliant stack test.

D.1.13 Parametric Monitoring

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.3, as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

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

D.1.14 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2(f) and D.1.3(b), the Permittee shall maintain monthly records of the number of board feet of rigid polyisocyanurate foam panels manufactured. The Permittee shall maintain monthly records of when the RTO is and is not in operation. Strip charts or computer records will be deemed sufficient.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain records of the visible emission notations of the inline cutting process (Stack CD-1) stack exhaust 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.1.9, the Permittee shall maintain records once per day of the pressure drop during normal operation. The Permittee shall include in its daily record when the 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) To document compliance with Conditions D.1.12 and D.1.13, the Permittee shall maintain the following:
 - (1) The continuous temperature records for the regenerative thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test.
 - (2) Daily records of the duct pressure or fan amperage. The Permittee shall include in its daily record when the duct pressure or fan amperage are not taken and the reason for the lack of the readings (e.g., the process did not operate that day).
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.15 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2(c), D.1.2(f), and D.1.3(b) 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).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (k) One (1) Cricket saw, with particulate matter emissions less than 5 pounds per hour or 25 pounds per day. [326 IAC 6-3-2]

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

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

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3, the particulate from the cricket saw shall be limited by the following:

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

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

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

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

Source Name: Johns Manville
Source Address: 1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP No.: F 099-17832-00042

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: Johns Manville
Source Address: 1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP No.: F 099-17832-00042

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 ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Johns Manville
Source Address: 1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP No.: F 099-17832-00042
Facilities: EU1 through EU4
Parameter: Amount of rigid polyisocyanurate foam panels manufactured
Limit: Shall not exceed 500,000,000 board feet per twelve (12) consecutive month period,
with compliance determined at the end of each month

YEAR: _____

Month	Foam Panel Production (board feet)	Foam Panel Production (board feet)	Foam Panel Production (board feet)
	This Month	Previous 11 Months	12 Month Total

- 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: Johns Manville
Source Address: 1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP No.: F 099-17832-00042
Facility: EU3
Parameter: VOC emissions
Limit: Shall not exceed 41.28 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

See Condition D.1.5 for Compliance Determination Equations

YEAR: _____

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

- 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: Johns Manville
Source Address: 1215 West Dewey Street, Bremen, Indiana 46506
Mailing Address: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP No.: F 099-17832-00042

Months: _____ to _____ Year: _____

Page 1 of 2

<p>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 <input type="checkbox"/> No deviations occurred this reporting period.</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report

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

Addendum to the Technical Support Document (ATSD) for a
Significant Permit Revision to a Federally Enforceable State Operating
Permit (FESOP)

Source Background and Description

Source Name:	Johns Manville
Source Location:	1215 West Dewey Street, Bremen, Indiana 46506
County:	Marshall
SIC Code:	3086
Operation Permit No.:	F 099-17832-00042
Operation Permit Issuance Date:	July 21, 2006
Significant Permit Revision No.:	099-26867-00042
Permit Reviewer:	Brian Williams

On October 21, 2008, the Office of Air Quality (OAQ) had a notice published in The Pilot News, Plymouth, Indiana, stating that Johns Manville had applied for a Significant Permit Revision to a FESOP to not operate the RTO during the months of November, December, January, February, and March when the inline cutting process is operating. Therefore, Johns Manville has requested revisions to the existing VOC emission and throughput limits for the entire rigid polyisocyanurate foam panel manufacturing process (EU1 through EU4). The notice also stated that the OAQ proposed to issue a Significant Permit Revision to a FESOP for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

No comments were received during the public notice period.

Additional Changes

IDEM, OAQ has decided to make additional revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

- (a) Upon further review Condition D.1.6 (Testing Requirements) has been revised to clarify that the testing will be repeated at least once every five years from the date of the most recent valid compliance demonstration.

...

D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.1.3(a), the Permittee shall perform VOC testing of the regenerative thermal oxidizer, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of ~~this~~ **the most recent** valid compliance demonstration. Testing shall be conducted in accordance with Section C-Performance Testing.

...

IDEM Contact

- (a) Questions regarding this proposed Significant Permit Revision to a FESOP can be directed to Brian Williams at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-

2251 or by telephone at (317) (234-5375) or toll free at 1-800-451-6027 extension (4-5375).

- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) 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

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name:	Johns Manville
Source Location:	1215 West Dewey Street, Bremen, Indiana 46506
County:	Marshall
SIC Code:	3086
Operation Permit No.:	F 099-17832-00042
Operation Permit Issuance Date:	July 21, 2006
Significant Permit Revision No.:	099-26867-00042
Permit Reviewer:	Brian Williams

On August 13, 2008, the Office of Air Quality (OAQ) received an application from Johns Manville related to a modification to an existing stationary rigid polyisocyanurate foam panel manufacturing source.

Existing Approvals

The source was issued FESOP Renewal No. 099-17832-00042 on July 21, 2006. The source has since received the following approval:

- (a) Administrative Amendment No. 099-25710-00042, issued on January 22, 2008.

County Attainment Status

The source is located in Marshall County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

- (a) Ozone Standards

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

- (b) **PM2.5**
Marshall County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

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

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Status of the Existing Source

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

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Foam head (EU1)	0.0	0.0	0.0	0.0	0.0	10.44	0.0	0.2	negl.
Foaming laminator (EU2)	0.0	0.0	0.0	0.0	0.0	21.2	0.0		
Inline cutting saws (EU3)	66.49	66.49	66.49	0.0	0.0	16.31	0.0	0.010	negl.
Foot slicer (FS)	negl.	negl.	negl.	0.0	0.0	0.589	0.0	0.0	0.0
Panel saw (PS)	18.05	18.05	18.05	0.0	0.0	0.589	0.0	0.0	0.0
Warehouse area (EU4)	0.0	0.0	0.0	0.0	0.0	3.55	0.0	0.0	0.0
Waste Recycling	17.48	13.7	13.7	0.0	0.0	4.65	0.0	0.0	0.0
Insignificant Activities	1.75	1.75	1.75	0.0	0.0	1.00	0.0	0.0	0.0
Total PTE of Entire Source	103.8	99.9	99.9	0.0	0.0	58.3	0.0	0.210	negl.
Title V Major Source Thresholds	NA	100	-	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA
negl. = negligible									
These emissions are based upon TSD to FESOP Renewal No: 099-17832-00042									

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Johns Manville on August 13, 2008, relating to their existing stationary rigid polyisocyanurate foam panel manufacturing facility. Johns Manville has requested the following modifications:

- (a) Pursuant to 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) and Condition D.1.3 of FESOP Renewal No. 099-17832-00042, the source is required to operate a regenerative thermal oxidizer (RTO) to control VOC emissions from the inline cutting process (EU3) at all times when the inline cutting process is in operation. However, in accordance with 326 IAC 8-1-2(a)(2) (Compliance Methods), Johns Manville is requesting the option to not operate the RTO during the months of November, December, January, February, and March when the inline cutting process is operating.

On April 25, 2007, the source performed stack testing to determine the uncontrolled and controlled emission rates from the inline cutting process. Based on these results, the source has requested to revise the existing VOC emission and throughput limits for the entire rigid polyisocyanurate foam panel manufacturing process (EU1 through EU4) to allow the source to not control the VOC emissions with the RTO during the months of November, December, January, February, and March.

However, even with this operational flexibility the entire source will continue to limit VOC emissions to less than 100 tons per twelve (12) consecutive month period, rendering the requirements of 326 IAC 2-7 not applicable. This revision 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.

- (b) The waste recycling process (EU5) has been permanently shut down; please remove all references to this process from the permit.
- (c) The facility cannot reach a capacity of 105,000 board feet per hour with the existing equipment. The correct capacity for the facility is 78,000 board feet per hour. As a result, please revise the emission unit descriptions and potential to emit calculations to reflect the correct capacities for the foam head (EU1), foaming laminator (EU2), inline cutting process (EU3), and the warehouse area (EU4).

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)			
	PM/PM10* (Before Revision)	PM/PM10* (After Revision)	VOC (Before Revision)	VOC (After Revision)
Foam Head (EU1)	0.0	0.0	10.44	16.73
Foaming laminator (EU2)	0.0	0.0	21.2	29.53
Inline cutting saws (EU3)	66.49	54.49	16.31	41.28
Warehouse Area (EU4)	0.0	0.0	3.55	1.93
Total PTE of Proposed Revision	66.49	54.49	51.5	89.47
* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".				

This FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(g)(2) because it involves adjustment to the existing source-wide emissions limitations to maintain the FESOP status of the source (see PTE of the Entire Source After The Issuance of the FESOP Revision Section).

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source (reflecting adjustment of existing limits), with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM	PM10 ¹	PM2.5 ²	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP
Foam head (EU1)	0.0	0.0	0.0	0.0	0.0	40.44 16.73	0.0	0.2	negl.
Foaming laminator (EU2)	0.0	0.0	0.0	0.0	0.0	21.2 29.53	0.0		
Inline cutting saws (EU3) ³	66.49 54.49	66.49 54.49	66.49 54.49	0.0	0.0	46.31 41.28	0.0	0.010	negl.
Foot slicer (FS)	negl.	negl.	negl.	0.0	0.0	0.589	0.0	0.0	0.0
Panel saw (PS) ³	18.05	18.05	18.05	0.0	0.0	0.589	0.0	0.0	0.0
Warehouse area (EU4)	0.0	0.0	0.0	0.0	0.0	3.55 1.93	0.0	0.0	0.0
Waste Recycling ⁴	17.48	13.7	13.7	0.0	0.0	4.65	0.0	0.0	0.0
Insignificant Activities ⁴	1.75	1.75	1.75	0.0	0.0	1.00	0.0	0.0	0.0
Cricket saw	4.32	4.32	4.32	0.0	0.0	0.59	0.0	0.0	0.0
Maintenance wire welder #1	negl.	negl.	negl.	0.0	0.0	0.0	0.0	negl.	negl.
Natural gas combustion⁵	0.19	0.75	0.75	0.06	9.89	0.54	8.31	0.187	0.178 Hexane
Degreaser	0.0	0.0	0.0	0.0	0.0	0.028	0.0	0.0	0.0
Total PTE of Entire Source	103.8 77.05	99.9 77.61	99.9 77.61	0.0 0.06	0.0 9.89	58.3 91.79	0.0 8.31	0.210 0.397	negl.
Title V Major Source Thresholds	NA	100	-	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA

negl. = negligible

¹ Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

² PM2.5 = PM10

³ Limited PM emissions based on the 326 IAC 6-3-2 allowable emissions. In addition, the PM10 and PM2.5 have been set equal to the 326 IAC 6-3-2 allowable emissions. These limits will render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable

⁴ The Waste Recycling process has been removed from the source. In addition, to provide clarity the emissions from insignificant activities have been itemized.

⁵ The emissions from natural gas combustion were previously omitted from FESOP Renewal No: 099-17832-00042.

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted)

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)								
	PM	PM10	PM2.5 ¹	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Foam head (EU1)	0.0	0.0	0.0	0.0	0.0	16.73	0.0	0.2	negl.
Foaming laminator (EU2)	0.0	0.0	0.0	0.0	0.0	29.53	0.0		
Inline cutting saws (EU3)**	54.49	54.49	54.49	0.0	0.0	41.28	0.0	0.010	negl.
Foot slicer (FS)	negl.	negl.	negl.	0.0	0.0	0.589	0.0	0.0	0.0
Panel saw (PS) ²	18.05	18.05	18.05	0.0	0.0	0.589	0.0	0.0	0.0
Warehouse area (EU4)	0.0	0.0	0.0	0.0	0.0	1.93	0.0	0.0	0.0
Cricket saw	4.32	4.32	4.32	0.0	0.0	0.59	0.0	0.0	0.0
Maintenance wire welder #1	negl.	negl.	negl.	0.0	0.0	0.0	0.0	negl.	negl.
Natural gas combustion	0.19	0.75	0.75	0.06	9.89	0.54	8.31	0.187	0.178 Hexane
Degreaser	0.0	0.0	0.0	0.0	0.0	0.028	0.0	0.0	0.0
Total PTE of Entire Source	77.05	71.61	71.61	0.06	9.89	91.79	8.31	0.397	negl.
Title V Major Source Thresholds	NA	100	-	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA
negl. = negligible ¹ PM2.5 = PM10 ² Limited PM emissions based on the 326 IAC 6-3-2 allowable emissions. In addition, the PM10 and PM2.5 have been set equal to the 326 IAC 6-3-2 allowable emissions. These limits will render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable									

(a) FESOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) PM₁₀ emissions from the inline cutting process (EU3) shall not exceed 12.44 pounds per hour, equivalent to 54.49 tons per year.
- (2) PM₁₀ emissions from the panel saw (PS) shall not exceed 4.12 pounds per hour, equivalent to 18.05 tons per year. This revision did not require any modification to this existing emission limit.
- (3) VOC emissions from the inline cutting process (EU3) shall not exceed 41.28 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. (Note: To demonstrate compliance with this limit an equation will be used)
- (4) VOC emissions from the foam head (EU1) shall not exceed 0.0000669 pounds per board feet.
- (5) VOC emissions from the foaming laminator (EU2) shall not exceed 0.0001181 pounds per board feet.
- (6) Throughput for the entire polyisocyanurate foam panel manufacturing process (EU1 through EU4) shall not exceed 500,000,000 board feet per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit PM₁₀ and VOC from all other emission units at this source, shall limit the source-wide total potential to emit of PM₁₀ and VOC to less than 100 tons per 12 consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), not applicable.

(b) PSD Minor Source

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall continue to comply with the following:

- (1) PM emissions from the inline cutting process (EU3) shall not exceed 12.44 pounds per hour, equivalent to 54.49 tons per year.
- (2) PM emissions from the panel saw (PS) shall not exceed 4.12 pounds per hour, equivalent to 18.05 tons per year. This revision did not require any modification to this existing emission limit.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the entire source is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) 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.

- (2) 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.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

Inline Cutting Process (EU3)

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the one (1) inline cutting process shall not exceed 12.44 pounds per hour when operating at a process weight rate of 10,485.24 pounds per hour (5.24 tons per hour). The pound per hour limitation was calculated with the following equation:

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

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

The dust collector system for particulate control equipped with a cyclone and baghouse, identified as PC1, control shall be in operation at all times when the inline cutting process (EU3) is in operation, in order to comply with this limit.

Compliance Determination, Monitoring and Testing Requirements

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP Renewal No. 099-17832-00042 on July 21, 2006.

Proposed Changes

- (a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:
- (1) All references to waste recycling process (EU5) have been removed from the permit.
 - (2) The foam head (EU1), foaming laminator (EU2), inline cutting saws (EU3), and the warehouse area (EU4) emission unit descriptions in Sections A.2 and D.1 have been revised to reflect the updated capacities and clarify the pollution control systems.
 - (3) The PM and PM10 emission limits found in Conditions D.1.1(a) and D.1.2(a) have been revised due to the new capacity of the inline cutting process (EU3).
 - (4) Condition D.1.2 has been revised to include new VOC emission and throughput limits for the foam head (EU1), foaming laminator (EU2), and the inline cutting process (EU3).
 - (5) Pursuant to 326 IAC 8-1-2(a)(2) the source is not required to operate the RTO during the months of November, December, January, February, and March. Therefore, Section D.1 contains new Compliance Determination, Record Keeping, and Reporting Requirements. In addition, the FESOP Quarterly Reports have been revised.

...

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:

- (a) One (1) foam head, identified as EU1, uncontrolled and exhausting to Stack 202, capacity: ~~405,000~~ **78,000** board feet per hour.
- (b) One (1) foaming laminator, identified as EU2, uncontrolled and exhausting to Stack 201, capacity: ~~405,000~~ **78,000** board feet per hour.
- (c) One (1) inline cutting process, identified as EU3, consisting of an edge trim saw, cross cut saw, and gang saw, **exhausting to a dust collector system for particulate control** equipped with a cyclone and baghouse, **identified as PC1, which exhausts to a pre-filter dust collector, identified as PC2,** ~~dust collector system for particulate control,~~ which exhausts to a regenerative thermal oxidizer **rated at 5.0 MMBtu/hr** for VOC control, exhausting to Stack CD-1, capacity: ~~405,000~~ **78,000** board feet per hour. The dust collector system consists of a **cyclone and** primary baghouse, **identified as PC1,** and a secondary pre-filter dust collector, **identified as PC2,** which is only utilized if and when the primary baghouse malfunctions.
- ...
- (f) One (1) warehouse area, identified as EU4, consisting of curing, staging and shipping areas for the finished panels, capacity: ~~405,000~~ **78,000** board feet per hour.
- ~~(g) One (1) waste recycling process, identified as EU5, including one (1) hogger, equipped with a dust collector for particulate control, exhausting to Stack BH-2, capacity: 11,520 board feet per hour.~~

...

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Foam panel manufacturing line

- (a) One (1) foam head, identified as EU1, uncontrolled and exhausting to Stack 202, capacity: ~~405,000~~ **78,000** board feet per hour.
- (b) One (1) foaming laminator, identified as EU2, uncontrolled and exhausting to Stack 201, capacity: ~~405,000~~ **78,000** board feet per hour.
- (c) One (1) inline cutting process, identified as EU3, consisting of an edge trim saw, cross cut saw, and gang saw, **exhausting to a dust collector system for particulate control** equipped with a cyclone and baghouse, **identified as PC1, which exhausts to a pre-filter dust collector, identified as PC2,** ~~dust collector system for particulate control,~~ which exhausts to a regenerative thermal oxidizer **rated at 5.0 MMBtu/hr** for VOC control, exhausting to Stack CD-1, capacity: ~~405,000~~ **78,000** board feet per hour. The dust collector system consists of a **cyclone and** primary baghouse, **identified as PC1,** and a secondary pre-filter dust collector, **identified as PC2,** which is only utilized if and when the primary baghouse malfunctions.
- ...
- (f) One (1) warehouse area, identified as EU4, consisting of curing, staging and shipping areas for the finished panels, capacity: ~~405,000~~ **78,000** board feet per hour.
- ~~(g) One (1) waste recycling process, identified as EU5, including one (1) hogger, equipped with a dust collector for particulate control, exhausting to Stack BH-2, capacity: 11,520 board feet per hour.~~

...

D.1.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the inline cutting process (EU3) shall not exceed ~~15.2~~ **12.44** pounds per hour when operating at a process weight rate of ~~14,114.75~~ **10,485.24** pounds per hour (~~7.06~~ **5.24** tons per hour).
- ~~(b) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the waste recycling process (EU5) shall not exceed 3.99 pounds per hour when operating at a process weight rate of 1,920 pounds per hour (0.96 tons per hour).~~
- (eb) Pursuant to 326 IAC 6-3-2, the particulate emission rate from the panel saw (PS) shall not exceed 4.12 pounds per hour when operating at a process weight rate of 2,016 pounds per hour (1.008 tons per hour).

...
D.1.2 PSD and FESOP Limitations (PM, PM₁₀ and VOC) [326 IAC 2-2] [326 IAC 2-8-4]

- (a) PM and PM₁₀ emissions from the inline cutting process (EU3) shall not exceed ~~15.18~~ **12.44** pounds per hour, equivalent to ~~66.49~~ **54.49** tons per year.
- ...
- ~~(c) Pursuant to SPR 099-17820-00042 issued on December 30, 2003, the total amount of foam panels delivered to the waste recycling process (EU5) shall be limited to less than 1,000,000 board feet per twelve (12) consecutive month period, with compliance determined at the end of each month. This is equivalent to VOC emissions less than 4.65 tons per year, based on the measured emission rate of 0.0093 pounds of VOC per board foot of foam panel recycled.~~
- ~~(d) PM₁₀ emissions from the waste recycling process (EU5) shall not exceed 0.0274 pounds per board foot, which is equivalent to 13.7 tons per year based on the annual limitation of 1,000,000 board feet delivered to the process. Compliance with this limit ensures compliance with Condition D.1.1(b).~~
- ~~(e) PM emissions from the waste recycling process (EU5) shall not exceed 3.99 pounds per hour, equivalent to 17.48 tons per year.~~
- (c) **VOC emissions from the inline cutting process (EU3) shall not exceed 41.28 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**
- (d) **VOC emissions from the foam head (EU1) shall not exceed 0.0000669 pounds per board feet.**
- (e) **VOC emissions from the foaming laminator (EU2) shall not exceed 0.0001181 pounds per board feet.**
- (f) **Throughput for the entire polyisocyanurate foam panel manufacturing process (EU1 through EU4) shall not exceed 500,000,000 board feet per twelve (12) consecutive month period, with compliance determined at the end of each month.**
- (ff) Compliance with these limits and the BACT limits in Condition D.1.3 will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply. These limitations shall also render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

...
D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 2-2] [326 IAC 2-8-4]

- (a) A regenerative thermal oxidizer shall be in operation at all times that the inline cutting process (EU3) is in operation, with an overall control efficiency of 90%; **except as**

specified in Condition D.1.3(c).

- (b) Throughput for the entire rigid polyisocyanurate foam panel manufacturing process (EU1 through EU54) shall not exceed 678,356,560 board feet per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) Pursuant to 326 IAC 8-1-2(a)(2), the RTO is not required to be in operation when the inline cutting process (EU3) is in operation during the months of November, December, January, February, and March.

...
D.1.5 Volatile Organic Compound (VOC) Emissions

Compliance with the VOC emission limitations contained in Condition D.1.2 shall be determined for each month using the quarterly reporting form located at the end of this permit. Compliance shall be based on the VOC emitted for the previous month added to the total VOC emitted for the previous 11 months, so as to arrive at the total VOC emitted for the most recent 12 consecutive month period.

- (a) When the RTO is in operation the VOC emissions from the inline cutting process (EU3) shall be calculated as follows:

$$\text{VOC}_{w/RTO} = (\text{EF} * \text{Y})$$

Where:

$\text{VOC}_{w/RTO}$ = VOC emissions with RTO control

EF = Emission Factor (0.000179 lb VOC/bdft) or the emission factor determined from the most recent valid stack test

Y = Total rigid polyisocyanurate foam panel board feet manufactured per period

- (b) When the RTO is not in operation during the months of November, December, January, February, and March, the VOC emissions from the inline cutting process (EU3) shall be calculated as follows:

$$\text{VOC}_{w/o RTO} = (\text{EF} * \text{X})$$

Where:

$\text{VOC}_{w/o RTO}$ = VOC emissions without RTO control

EF = Emission Factor (0.000372 lb VOC/bdft) or the emission factor determined from the most recent valid stack test

X = Total board feet of rigid polyisocyanurate foam panels manufactured per period

- (c) Total VOC emissions for each compliance period shall be determined using the following equation:

$$\text{Total VOC Emissions} = \text{VOC}_{w/RTO} + \text{VOC}_{w/o RTO}$$

Where:

$\text{VOC}_{w/RTO}$ = VOC emissions with RTO control

$\text{VOC}_{w/o RTO}$ = VOC emissions without RTO control

D.1.56 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

~~On or before February 26, 2008,~~ in order to demonstrate compliance with Condition D.1.3(a), the Permittee shall perform VOC testing of the regenerative thermal oxidizer, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

D.1.67 Particulate Control

- (a) In order to comply with Conditions D.1.1 and D.1.2, the cyclone and baghouse dust collector system for particulate control, **identified as PC1**, shall be in operation and control emissions from the inline cutting process (EU3), the foot slicer (FS) and the panel saw (PS) at all times that the inline cutting process (EU3), the foot slicer (FS) and the panel saw (PS) are in operation.
- ~~(b) In order to comply with Conditions D.1.1 and D.1.2, the dust collector system for particulate control shall be in operation and control emissions from the hogger in the waste recycling process (EU5) at all times that the hogger in the waste recycling process (EU5) is in operation.~~
- (eb) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.78 Visible Emissions Notations

- (a) Visible emission notations of the inline cutting process (EU3) stack exhaust (Stack CD-1) ~~and the waste recycling process (EU5) stack exhaust (Stack BH-2)~~ shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

...

D.1.89 Parametric Monitoring

...

- ~~(b) The Permittee shall record the pressure drop across the dust collector (BH-2) used in conjunction with the waste recycling process (EU5), at least once per day when the waste recycling process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.1 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C- Response to Excursions or Exceedances, shall be considered a deviation from this permit.~~
- (eb) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.910 Broken or Failed Bag Detection

...

D.1.101 Cyclone Failure Detection

...

D.1.142 Thermal Oxidizer Temperature

...

D.1.123 Parametric Monitoring

...

D.1.134 Record Keeping Requirements

- (a) ~~To document compliance with Condition D.1.2(c), the Permittee shall maintain monthly records of the amount of foam panels delivered to the waste recycling process (EU5).~~
- (ba) To document compliance with Conditions **D.1.2(f)** and D.1.3(b), the Permittee shall maintain monthly ~~throughput~~ records of the number of board feet of rigid polyisocyanurate foam panels manufactured. **The Permittee shall maintain monthly records of when the RTO is and is not in operation. Strip charts or computer records will be deemed sufficient.**
- (eb) To document compliance with Condition D.1.78, the Permittee shall maintain records of the visible emission notations of the inline cutting process (Stack CD-1) ~~and waste recycling (Stack BH-2) stack exhausts~~ 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).**
- (ec) To document compliance with Condition D.1.89, the Permittee shall maintain records once per day of the pressure drop during normal operation. **The Permittee shall include in its daily record when the 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).**
- (ed) To document compliance with Conditions D.1.142 and D.1.123, the Permittee shall maintain the following:
- ...
- (2) Daily records of the duct pressure or fan amperage. **The Permittee shall include in its daily record when the duct pressure or fan amperage are not taken and the reason for the lack of the readings (e.g., the process did not operate that day).**
- (fe) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.145 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2(c), **D.1.2(f)**, and D.1.3(b) 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).

...

FESOP Quarterly Report

...

Facilities: EU1 through EU54
Parameter: Amount of rigid polyisocyanurate foam panels manufactured
Limit: ~~Less than a total of~~ **Shall not exceed 500,000,000** board feet per twelve (12) consecutive month period, with compliance determined at the end of each month

...

FESOP Quarterly Report

Source Name: ~~Johns Manville~~
Source Address: ~~1215 West Dewey Street, Bremen, Indiana 46506~~
Mailing Address: ~~1215 West Dewey Street, Bremen, Indiana 46506~~

FESOP No.: ~~_____ F 099-17832-00042~~
Facility: ~~_____ EU5~~
Parameter: ~~_____ Amount of rigid polyisocyanurate foam panels delivered to the process~~
Limit: ~~_____ Less than 1,000,000 board feet per twelve (12) consecutive month period, with compliance determined at the end of each month~~

...

FESOP Quarterly Report

Source Name: **Johns Manville**
Source Address: **1215 West Dewey Street, Bremen, Indiana 46506**
Mailing Address: **1215 West Dewey Street, Bremen, Indiana 46506**
FESOP No.: **F 099-17832-00042**
Facility: **EU3**
Parameter: **VOC emissions**
Limit: **Shall not exceed 41.28 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**

See Condition D.1.5 for Compliance Determination Equations

...

- (b) Upon further review, IDEM, OAQ has decided to make the following changes to the permit. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:
- (1) Section A.1 has been revised to clarify that the source is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7.
 - (2) In order to provide clarification, Sections A.2(c) and D.1(c) have been updated to include the heat input capacity for the existing regenerative thermal oxidizer (see changes above).
 - (3) The source consists of various existing insignificant natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour that were previously omitted from FESOP Renewal No. 099-17832-00042 on July 21, 2006. To ensure the permit is accurate the emission unit descriptions have been added to Section A.3. In addition, the potential to emit calculations have been updated to reflect the emissions from these units. There are no applicable state or federal rules applicable to the units.
 - (4) Conditions D.1.14(b), (c), and (d)(2) – Record Keeping Requirements for Visible Emission Notations and Parametric Monitoring (original Conditions D.1.7, D.1.8, and D.1.12) are revised to clarify that the Permittee needs to make a record of some sort every day. The intent of Record Keeping Requirements for Visible Emission Notations and Parametric Monitoring is that the Permittee needs to make a record of some sort every day. An example for Visible Emission Notations would be "normal" or "abnormal". Additionally, if Visible Emission Notations were not done on a particular day, the Permittee needs to specify the reason why the observation was not done. An example of this record would be "the unit was not operating" or "the unit was venting indoors" (see changes above).

...

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

...

Source Status: **Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD Rules
Minor Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories**

...

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

...

- (o) **Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.**

- (1) **Four (4) natural gas-fired make-up air heaters, with a maximum heat input capacity of 1.21 MMBtu/hr, each.**
- (2) **Five (5) natural gas-fired thermocyclers, with a maximum heat input capacity of 0.4 MMBtu/hr, each.**
- (3) **Two (2) natural gas-fired furnaces, with a maximum heat input capacity of 0.126 MMBtu/hr, each.**
- (4) **Four (4) natural gas-fired thermocyclers, with a maximum heat input capacity of 0.58 MMBtu/hr, each.**
- (5) **Three (3) natural gas-fired make-up air heaters, with a maximum heat input capacity of 0.75 MMBtu/hr, each.**
- (6) **Three (3) natural gas-fired make-up air heaters, with a maximum heat input capacity of 0.972 MMBtu/hr, each.**
- (7) **Two (2) natural gas-fired process furnaces, with a maximum heat input capacity of 1.5 MMBtu/hr, each.**

...

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on August 13, 2008.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Revision No. 099-26867-00042. The staff recommends to the Commissioner that this FESOP Significant Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brian Williams at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) (234-5375) or toll free at 1-800-451-6027 extension (4-5375).
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) 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

**Appendix A: Emission Calculations
Unlimited Emission Calculations**

**Company Name: Johns Manville
Address City IN Zip: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP: 099-26867-00042
Permit Reviewer: Brian Williams**

Unrestricted Potential to Emit

Emission Unit	Max Capacity	Pollutant	Emission Factor	Source of Emission Factor	Control Efficiency %	PM (tons/yr)	PM-10 (tons/yr)	SOx (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)
Foam Head (EU1)	78,000 bdft/hr	VOC	6.69E-05 (lb/bdft)	Stack Test*	0.00%	0.00	0.00	0.00	0.00	22.86	0.00
Foaming Laminator (EU2)	78,000 bdft/hr	VOC	1.18E-04 (lb/bdft)	Stack Test*	0.00%	0.00	0.00	0.00	0.00	40.3	0.00
Inline Cutting Saws (EU3)	78,000 bdft/hr	PM	1.32E-03	Mass Bal	0.00%	450.96	450.96	0.00	0.00	127.09	0.00
		PM-10	1.32E-03	Mass Bal	0.00%						
		VOC	3.72E-04 (lb/bdft)	Stack Test	0.00%						
Foot Slicer (FS)	640 bdft/hr	PM	0.00E+00	Mass Bal	0.00%	0.000	0.000	0.00	0.00	0.589	0.00
		PM-10	0.00E+00	Mass Bal	0.00%						
		VOC	2.10E-04 (lb/bdft)	Mass Bal	0.00%						
Panel Saw (PS)	640 bdft/hr	PM	2.85E-03	Mass Bal	0.00%	7.989	7.989	0.00	0.00	0.589	0.00
		PM-10	2.85E-03	Mass Bal	0.00%						
		VOC	2.10E-04 (lb/bdft)	Mass Bal	0.00%						
Warehouse Area (EU4)	78,000 bdft/hr	VOC	7.71E-06 (lb/bdft)	Mass Bal	0.00%	0.00	0.00	0.00	0.00	2.63	0.00
Natural Gas Combustion	22.58 MMBtu/hr					0.188	0.752	0.059	9.889	0.544	8.307
Cricket Saw	640 bdft/hr	PM	1.54E-03	Mass Bal	0.00%	4.32	4.32	0.00	0.00	0.59	0.00
		PM-10	1.54E-03	Mass Bal	0.00%						
		VOC	2.10E-04 (lb/bdft)	Mass Bal	0.00%						
Maintenance Wire Welder #1	120 lbs/yr					0.00031	0.00031	0.00	0.00	0.00	0.00
Aerosol Based Degreaser (100% VOC)	5 gallon/yr	VOC	11 (lb/gal)	MSDS	0.00%	0.00	0.00	0.00	0.00	0.028	0.00
TOTAL						463.46	464.02	0.06	9.89	195.26	8.31

METHODOLOGY

Emissions = Max Capacity x Emission Factor x (1 - Control Efficiency)

Emission factors are from Mass Balance calculations submitted by the applicant, or are from actual stack tests performed at the source in April of 2007.

*Includes a safety factor to ensure compliance with 326 IAC 2-2 and 326 IAC 2-8-4

**Appendix A: Emission Calculations
Emission Calculations after Controls**

**Company Name: Johns Manville
Address City IN Zip: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP: 099-26867-00042
Permit Reviewer: Brian Williams**

Potential to Emit after Controls

Emission Unit	Limited Throughput	Pollutant	Emission Factor	Source of Emission Factor	Control Efficiency %	PM (tons/yr)	PM-10 (tons/yr)	SOx (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)
Foam Head (EU1)	500,000,000 bdf/yr	VOC	6.69E-05 (lb/bdf)	Stack Test	0.00%	0.00	0.00	0.00	0.00	16.73	0.00
Foaming Laminator (EU2)	500,000,000 bdf/yr	VOC	1.18E-04 (lb/bdf)	Stack Test	0.00%	0.00	0.00	0.00	0.00	29.53	0.00
Inline Cutting Saws (EU3)	500,000,000 bdf/yr	PM	1.32E-03	Mass Bal	99.00%	3.30	3.30	0.00	0.00	41.28***	0.00
		PM-10	1.32E-03	Mass Bal	99.00%						
		VOC*	3.72E-04	Stack Test	0.00%						
		VOC**	1.79E-05 (lb/bdf)	Stack Test	0.00%						
Foot Slicer (FS)	640 bdf/hr	PM	0.00E+00	Mass Bal	99.00%	0.000	0.000	0.00	0.00	0.589	0.00
		PM-10	0.00E+00	Mass Bal	99.00%						
		VOC	2.10E-04 (lb/bdf)	Mass Bal	0.00%						
Panel Saw (PS)	640 bdf/hr	PM	2.85E-03	Mass Bal	99.00%	0.080	0.080	0.00	0.00	0.589	0.00
		PM-10	2.85E-03	Mass Bal	99.00%						
		VOC	2.10E-04 (lb/bdf)	Mass Bal	0.00%						
Warehouse Area (EU4)	500,000,000 bdf/yr	VOC	7.71E-06 (lb/bdf)	Mass Bal	0.00%	0.00	0.00	0.00	0.00	1.93	0.00
Natural Gas Combustion	22.58 MMBtu/hr					0.188	0.752	0.059	9.889	0.544	8.307
Cricket Saw	640 bdf/hr	PM	1.54E-03	Mass Bal	99.50%	0.02	0.02	0.00	0.00	0.59	0.00
		PM-10	1.54E-03	Mass Bal	99.50%						
		VOC	2.10E-04 (lb/bdf)	Mass Bal	0.00%						
Maintenance Wire Welder #1	120 lbs/yr					0.00031	0.00031	0.00	0.00	0.00	0.00
Aerosol Based Degreaser (100% VOC)	5 gallon/yr	VOC	11 (lb/gal)	MSDS	0.00%	0.00	0.00	0.00	0.00	0.028	0.00
TOTAL						3.59	4.15	0.06	9.89	50.51	8.31

METHODOLOGY

Emissions = Max Capacity x Emission Factor x (1 - Control Efficiency)
Emission factors are from Mass Balance calculations submitted by the applicant, or are from actual stack tests performed at the source in April of 2007.
*Uncontrolled VOC emission factor to be used to calculate VOC emissions during November, December, January, February, and March.
**Controlled VOC emission factor to be used to calculate VOC emissions during April, May, June, July, August and September.
***The VOC emissions from EU3 shall not exceed 41.28 tons per year. In addition, EU3 shall continue to not exceed 500,000,000 bdf/yr.

Appendix A: Emission Calculations
Emission Calculations

Company Name: Johns Manville
Address City IN Zip: 1215 West Dewey Street, Bremen, Indiana 46506
FESOP: 099-26867-00042
Permit Reviewer: Brian Williams

Limited Potential to Emit After Issuance								
Emission Unit	PM	PM10*	SO ₂	NO _x	VOC	CO	Total HAPs	Single HAP
Foam Head (EU1)	0.0	0.0	0.0	0.0	16.73	0.0		
Foaming Laminator (EU2)	0.0	0.0	0.0	0.0	29.53	0.0	0.2	negl.
Inline Cutting Process (EU3)**	54.49	54.49	0.0	0.0	41.28	0.0	0.01	negl.
Foot Slicer (FS)	0.0	0.0	0.0	0.0	0.589	0.0	0.0	0.0
Panel Saw (PS)**	18.05	18.05	0.0	0.0	0.589	0.0	0.0	0.0
Warehouse Area (EU4)	0.0	0.0	0.0	0.0	1.93	0.0	0.0	0.0
Natural Gas Combustion	0.19	0.75	0.06	9.89	0.54	8.31	0.187	negl.
Cricket Saw	4.32	4.32	0.0	0.0	0.59	0.0	0.0	0.0
Maintenance Wire Welder #1	0.00031	0.00031	0.0	0.0	0.0	0.0	negl.	negl.
Aerosol Based Degreaser	0.0	0.0	0.0	0.0	0.028	0.0	0.0	0.0
Total	77.05	77.61	0.06	9.89	91.79	8.31	0.397	negl.

negl. = negligible

*PM2.5 = PM10

**Limited PM emissions based on 326 IAC 6-3-2 allowable emissions.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Johns Manville
Address City IN Zip: 1215 West Dewey Street, Bremen, Indiana 46506
Permit Number: 099-26867-00042
Reviewer: Brian Williams

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
22.58	197.8

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.188	0.752	0.06	9.89	0.54	8.31

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM10 = PM2.5
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.077E-04	1.187E-04	7.417E-03	1.780E-01	3.362E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	4.945E-05	1.088E-04	1.384E-04	3.758E-05	2.077E-04

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
PM and HAPs
From Arc Welding Operations**

**Company Name: Johns Manville
Address City IN Zip: 1215 West Dewey Street, Bremen, Indiana 46506
Permit Number: 099-26867-00042
Reviewer: Brian Williams**

Process	Material Usage (lbs/yr)	Emission Factors (lb/10 ³ lb)					Potential to Emit (tons/yr)				
		Chromium	Cobalt	Manganese	Nickel	PM/PM10	Chromium	Cobalt	Manganese	Nickel	PM/PM10
Arc Welding	(lbs/yr)										
GMAW E70S	120	0.01	0.01	3.18	0.01	5.2	6.00E-07	6.00E-07	1.91E-04	6.00E-07	3.12E-04
Total							6.00E-07	6.00E-07	1.91E-04	6.00E-07	3.12E-04

Methodology

Potential to Emit (tons/yr) = Material Usage (lbs/yr) * Emission Factor (lb/10³ lb) * 1/2000 (ton/lbs)

Emission Factors are from AP-42, Chapter 12.19, Table 12.19-1 and 12.19-2 (01/1995)