



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: July 31, 2009  
RE: Foamex Innovations, Inc. / 033-27355-00047  
FROM: Matthew Stuckey, Deputy Branch Chief  
Permits Branch  
Office of Air Quality

### Notice of Decision: Approval – Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

## Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Foamex Innovations, Inc.  
2211 South Wayne Street  
Auburn, Indiana 46706**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T033-27355-00047	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 31, 2009  Expiration Date: July 31, 2014

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## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

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

Source Address:	2211 South Wayne Street, Auburn, Indiana 46706
Mailing Address:	2211 South Wayne Street, Auburn, Indiana 46706
General Source Phone Number:	260-925-1073
SIC Code:	3086
County Location:	DeKalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program 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 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

- (a) Four (4) rebond mold units, identified as EU-R1, EU-R2, EU-R3, and EU-R4, with a total maximum capacity of bonding 9.6 tons per hour of scrap foam. Each mold unit has an associated dryer (total of four (4) dryers). Each mold unit exhausts through one (1) separate stack. There are a total of eight (8) exhaust stacks (28a, 28b, 29a, 29b, 35a, 35b, 36a, 36b) that serve each mold unit and each dryer.
- (b) One (1) source-wide adhesive application operation, with emissions venting inside the plant;
- (c) One (1) source-wide chemical cleaning solvent usage operation, with emissions venting inside the plant;
- (d) One (1) Variable Pressure Foaming (VPF) line, constructed in 2001 and modified in 2005, with a maximum production rate of 1.2 billion board feet of foam per twelve (12) consecutive month period, using carbon adsorbers as control, and exhausting to Stacks 39 and 40. The flexible foam is produced by the mix of TDI and/or MDI with polyol and/or resin and other chemicals, including amines, tins, silicones, and fillers; and
- (e) Three (3) natural gas-fired industrial boilers identified as Boilers #1, #2 and #3 (EU-B1, EU-B2, EU-B3), each rated at 10.5 million (MM) British thermal units (Btu) per hour and exhausted through three (3) stacks (S/V ID 31,32,33), respectively. Boilers #1 and #2 were installed in 1978 and Boiler #3 was installed in 1986.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities:

- (a) Natural gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
  - (1) Decommissioned 2.1 MMBtu/hour natural gas-fired boiler;
- (b) Propane or liquefied petroleum gas, or butane fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour;
- (c) 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; and
  - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (d) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6:
  - (1) One (1) 100% petroleum distillate Safety-Kleen parts washer, installed in 2002, with a remote solvent reservoir; [326 IAC 8-3-2]
- (e) Cleaners and solvents characterized as follows:
  - (1) having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psi measured at 38 degrees Celsius (100°F) or
  - (2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees Celsius (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per twelve (12) months;
- (f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment; [326 IAC 6-3-2]
- (g) Closed loop heating and cooling systems:
  - (1) One (1) glycol chiller system;
- (h) Infrared cure equipment:
  - (1) One (1) laminator equipped with an infrared heating unit;
- (i) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;
- (j) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (k) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

- (l) Heat exchanger cleaning and repair;
- (m) Process vessel degassing and cleaning to prepare for internal repairs;
- (n) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4]
- (o) Blowdown of any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (p) Gasoline emergency generators not exceeding 110 horsepower;
- (q) Stationary fire pumps;
- (r) Purge double block and bleed valves;
- (s) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kPa measured at 38 degrees Celsius (100°F));
- (t) Two (2) Baumer loop slitters using an n-propyl bromide-based adhesive;
- (u) The following units emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:
  - (1) TDI/MDI Storage Tanks and TDI Doper Tank, all equipped with carbon drums; [40 CFR 63, Subpart III]
  - (2) Filler handling and storage;
  - (3) Hot wire seamers; and
  - (4) Two (2) hot roll laminators;
- (v) The following activities not previously identified with emissions equal to or less than insignificant thresholds:
  - (1) Ink handling and applications - VOC emissions less than three (3) lbs/hr or fifteen (15) lbs/day;
  - (2) Resin storage tanks (polyol tanks) - VOC emissions less than three (3) lbs/hr or fifteen (15) lbs/day;
  - (3) Amines storage tanks - VOC emissions less than three (3) lbs/hr or fifteen (15) lbs/day;
  - (4) Fire retardant storage tanks - VOC emissions less than three (3) lbs/hr or fifteen (15) lbs/day;
  - (5) Two (2) hot roll (drum) laminators - VOC emissions less than three (3) lbs/hr or fifteen (15) lbs/day;
  - (6) Process oil storage tanks - VOC emissions less than three (3) lbs/hr or fifteen (15) lbs/day;
  - (7) Binder storage tanks - VOC emissions less than three (3) lbs/hr or fifteen (15) lbs/day; and

- (8) Binder blend tanks - VOC emissions less than three (3) lbs/hr or fifteen (15) lbs/day.
- (w) Bun cutters; [326 IAC 6-3-2]
- (x) BSV slitters; [326 IAC 6-3-2]
- (y) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone; [326 IAC 6-3-2]
- (z) One (1) rebond granulation area, equipped with a cyclone and a dusthouse for particulate control; [326 IAC 6-3-2]
- (aa) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations; [326 IAC 6-3-2]
- (bb) Laboratory emissions:
  - (1) Product test burning; and
- (cc) One (1) quick cool unit, identified as QC-01, constructed in 2009, with a maximum production capacity of twenty (20) batches of foam buns per hour, and exhausting to stack 37 (S/V ID 37).

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

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

### B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

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- (a) This permit, T033-27355-00047, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

### B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

### B.5 Severability [326 IAC 2-7-5(5)]

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

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. 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 and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

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- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

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

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

Telephone Number: 317-233-0178 (ask for Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865  
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
  - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

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- (a) All terms and conditions of permits established prior to T033-27355-00047 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

**B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs**  
[326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)

77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

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

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

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

**B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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- (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 and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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

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

### C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

**C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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

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

**C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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

**C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

- (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]**

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

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

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

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

- (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 or ninety (90) days of initial start-up, whichever is later.

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or

before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Four (4) rebond mold units, identified as EU-R1, EU-R2, EU-R3, and EU-R4, with a total maximum capacity of bonding 9.6 tons per hour of scrap foam. Each mold unit has an associated dryer (total of four (4) dryers). Each mold unit exhausts through one (1) separate stack. There are a total of eight (8) exhaust stacks (28a, 28b, 29a, 29b, 35a, 35b, 36a, 36b) that serve each mold unit and each dryer.
- (b) One (1) source-wide adhesive application operation, with emissions venting inside the plant;
- (c) One (1) source-wide chemical cleaning solvent usage operation, with emissions venting inside the plant; and
- (d) One (1) Variable Pressure Foaming (VPF) line, constructed in 2001 and modified in 2005, with a maximum production rate of 1.2 billion board feet of foam per twelve (12) consecutive month period, using carbon adsorbers as control, and exhausting to Stacks 39 and 40. The flexible foam is produced by the mix of TDI and/or MDI with polyol and/or resin and other chemicals, including amines, tins, silicones, and fillers.

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

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

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

Pursuant to Significant Source Modification 033-20970-00047, issued October 25, 2005, Significant Permit Modification 033-21341-00047, issued November 8, 2005, and 326 IAC 8-1-6 (BACT), the VOC BACT for the VPF Line shall be the following:

- (a) The Permittee shall operate the carbon adsorber to control total VOC emissions from the VPF line at all times that the VPF line is in operation.
- (b) The carbon adsorber shall operate at a minimum overall control efficiency of 51% for total VOC (including TDI, MDI, and tertiary amine VOC).
- (c) VOC emissions from the carbon adsorber shall not exceed 38.5 lbs/hr.
- (d) The production of polyurethane foam in the VPF line shall be limited to a maximum of 1.2 billion board feet per twelve (12) consecutive month period with compliance determined at the end of each month.

#### D.1.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the four (4) rebond mold unit facilities (EU-R1, EU-R2, EU-R3, EU-R4) shall not exceed a total of 18.66 pounds per hour when operating at a total process weight rate of 9.6 tons per hour.

The pounds per hour limitation was calculated with the following equation:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

**D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the rebond mold units, the VPF line, and any associated control devices.

**Compliance Determination Requirements**

**D.1.4 Testing Requirements [326 IAC 2-1.1-11]**

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- (a) To determine compliance with Condition D.1.1(b) and (c), the Permittee shall perform VOC testing on the carbon adsorber controlling VOC emissions from the VPF line 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. The most recent valid test was performed on April 13, 2007. Testing shall be conducted in accordance with Section C - Performance Testing of the permit.

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

**D.1.5 Record Keeping Requirement**

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- (a) To document compliance with Condition D.1.1(d), the Permittee shall maintain records of the amount of polyurethane foam produced in the VPF line.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.1.6 Reporting Requirement**

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A quarterly summary of the information to document compliance with Condition D.1.1(d) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Three (3) natural gas-fired industrial boilers identified as Boilers #1, #2 and #3 (EU-B1, EU-B2, EU-B3), each rated at 10.5 million (MM) British thermal units (Btu) per hour and exhausted through three (3) stacks (S/V ID 31,32,33), respectively. Boilers #1 and #2 were installed in 1978 and Boiler #3 was installed in 1986.

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

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

#### D.2.1 Particulate Matter [326 IAC 6-2-3] [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-3(e) (Particulate Matter Emissions Limitations for Sources of Indirect Heating), the particulate emissions from each of Boiler #1 (EU-B1) and Boiler #2 (EU-B2), (each rated at 10.5 MMBtu per hour), which began operation after June 8, 1972, shall not exceed 0.6 pounds per MMBtu heat input each.
- (b) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the particulate emissions from the 10.5 MMBtu per hour heat input Boiler #3 (EU-B3) (installed in 1986) shall not exceed 0.44 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = Pounds of particulate matter emitted per MMBtu heat input.  
Q = Total source maximum operating capacity rating of indirect heating facilities in MMBtu per hour.

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6:
  - (1) One (1) 100% petroleum distillate Safety-Kleen parts washer, installed in 2002, with a remote solvent reservoir; [326 IAC 8-3-2]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment; [326 IAC 6-3-2]
- (c) Bun cutters; [326 IAC 6-3-2]
- (d) BSV slitters; [326 IAC 6-3-2]
- (e) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone; [326 IAC 6-3-2]
- (f) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. [326 IAC 6-3-2]

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

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

#### D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

The one (1) parts washer with remote solvent reservoir is subject to the requirements of 326 IAC 8-3-2 because it was constructed after January 1, 1980. Therefore, pursuant to 326 IAC 8-3-2, the Permittee shall:

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

### D.3.2 Particulate Matter [326 IAC 6-3-2]

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Pursuant to 326 IAC 6-3-2, the particulate from the insignificant activities listed below shall not exceed 0.551 pounds per hour, each:

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment;
- (b) Bun cutters;
- (c) BSV slitters;
- (d) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone; and
- (e) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.

The emissions rate is calculated by the following:

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:

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

## SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Four (4) rebond mold units, identified as EU-R1, EU-R2, EU-R3, and EU-R4, with a total maximum capacity of bonding 9.6 tons per hour of scrap foam. Each mold unit has an associated dryer (total of four (4) dryers). Each mold unit exhausts through one (1) separate stack. There are a total of eight (8) exhaust stacks (28a, 28b, 29a, 29b, 35a, 35b, 36a, 36b) that serve each mold unit and each dryer.
- (b) One (1) source-wide adhesive application operation, with emissions venting inside the plant;
- (c) One (1) source-wide chemical cleaning solvent usage operation, with emissions venting inside the plant;
- (d) One (1) Variable Pressure Foaming (VPF) line, constructed in 2001 and modified in 2005, with a maximum production rate of 1.2 billion board feet of foam per twelve (12) consecutive month period, using carbon adsorbers as control, and exhausting to Stacks 39 and 40. The flexible foam is produced by the mix of TDI and/or MDI with polyol and/or resin and other chemicals, including amines, tins, silicones, and fillers; and

### Insignificant Activity:

- (e) The following units emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:
  - (A) TDI/MDI Storage Tanks and TDI Doper Tank, all equipped with carbon drums; [40 CFR 63, Subpart III]

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

### E.1.1 General Provisions Relating to NESHAP III [326 IAC 20-1] [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.1302, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 2 of 40 CFR Part 63, Subpart III in accordance with the schedule in 40 CFR 63, Subpart III.

### E.1.2 Flexible Polyurethane Foam Production NESHAP [326 IAC 20-22] [40 CFR Part 63, Subpart III]

The Permittee which engages in flexible polyurethane foam production shall comply with the provisions of 40 CFR Part 63, Subpart III, which is incorporated by reference as 326 IAC 20-22, as follows. The full text of Subpart III may be found in Attachment A to this permit.

This source is subject to the following portions of Subpart III:

- (1) 40 CFR 63.1290;
- (2) 40 CFR 63.1291;
- (3) 40 CFR 63.1292;
- (4) 40 CFR 63.1293;
- (5) 40 CFR 63.1294;
- (6) 40 CFR 63.1299;

- (7) 40 CFR 63.1301;
- (8) 40 CFR 63.1302;
- (9) 40 CFR 63.1303;
- (10) 40 CFR 63.1304;
- (11) 40 CFR 63.1306;
- (12) 40 CFR 63.1307;
- (13) 40 CFR 63.1308; and
- (14) Table 2 to Subpart III.

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

Source Name: Foamex Innovations, Inc.  
Source Address: 2211 South Wayne Street, Auburn, Indiana 46706  
Mailing Address: 2211 South Wayne Street, Auburn, Indiana 46706  
Part 70 Permit No.: T033-27355-00047

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Foamex Innovations, Inc.  
Source Address: 2211 South Wayne Street, Auburn, Indiana 46706  
Mailing Address: 2211 South Wayne Street, Auburn, Indiana 46706  
Part 70 Permit No.: T033-27355-00047

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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

Page 2 of 2

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

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

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

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

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

A certification is not required for this report.

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

**Part 70 Quarterly Report**

Source Name: Foamex Innovations, Inc.  
Source Address: 2211 South Wayne Street, Auburn, Indiana 46706  
Mailing Address: 2211 South Wayne Street, Auburn, Indiana 46706  
Part 70 Permit No.: T033-27355-00047  
Facility: VPF Line  
Parameter: Polyurethane foam production  
Limit: Less than 1.2 billion board feet per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER :

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

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

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

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

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE AND ENFORCEMENT BRANCH**  
**PART 70 OPERATING PERMIT**  
**QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Foamex Innovations, Inc.  
 Source Address: 2211 South Wayne Street, Auburn, Indiana 46706  
 Mailing Address: 2211 South Wayne Street, Auburn, Indiana 46706  
 Part 70 Permit No.: T033-27355-00047

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

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

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

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

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

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

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

Attach a signed certification to complete this report.

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

Attachment A for a  
Part 70 Operating Permit Renewal

**Source Background and Description**

Source Name:	Foamex Innovations, Inc.
Source Location:	2211 South Wayne Street, Auburn, Indiana 46706
County:	DeKalb
SIC Code:	3086
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**National Emission Standards for Hazardous Air Pollutants**

**Subpart III—National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production**

**Source:** 63 FR 53996, Oct. 7, 1998, unless otherwise noted.

**§ 63.1290 Applicability.**

(a) The provisions of this subpart apply to each new and existing flexible polyurethane foam or rebond foam process that meets the criteria listed in paragraphs (a)(1) through (3) of this section.

(1) Produces flexible polyurethane or rebond foam;

(2) Emits a HAP, except as provided in paragraph (c)(2) of this section; and

(3) Is located at a plant site that is a major source, as defined in §63.2 of subpart A.

(b) For the purpose of this subpart, an affected source includes all processes meeting the criteria in paragraphs (a)(1) through (a)(3) of this section that are located at a contiguous plant site, with the exception of those processes listed in paragraph (c) of this section.

(c) A process meeting one of the following criteria listed in paragraphs (c)(1) through (3) of this section shall not be subject to the provisions of this subpart:

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

(2) A research and development process; or

(3) A slabstock flexible polyurethane foam process at a plant site where the total amount of HAP, excluding diisocyanate reactants, used for slabstock foam production and foam fabrication is less than or equal to five tons per year, provided that slabstock foam production and foam fabrication processes are the only processes at the plant site that emit HAP. The amount of non-diisocyanate HAP used,  $HAP_{used}$ , shall be calculated using Equation 1. Owners or operators of slabstock foam processes exempt from the regulation in accordance with this paragraph shall maintain records to verify that total non-diisocyanate HAP use at the plant site is less than 5 tons per year (4.5 megagrams per year).

$$HAP_{used} = \left[ \sum_{i=1}^m (VOL_{ABH, i})(D_{ABH, i}) + \sum_{j=1}^n (VOL_{clean, j})(D_{clean, j})(WT_{HAPclean, j}) + \sum_{k=1}^o (VOL_{adh, k})(D_{adh, k})(WT_{HAPadh, k}) \right] + 2000$$

(Equation 1)

Where,

$HAP_{used}$  = amount of HAP, excluding diisocyanate reactants, used at the plant site for slabstock foam production and foam fabrication, tons per year

$VOL_{ABA,i}$  = volume of HAP ABA i used at the facility, gallons per year

$D_{ABA,i}$  = density of HAP ABA i, pounds per gallon

m = number of HAP ABAs used

$VOL_{clean,j}$  = volume of HAP used as an equipment cleaner, gallons per year

$D_{clean,j}$  = density of HAP equipment cleaner j, pounds per gallon

$WT_{HAPclean,k}$  = HAP content of equipment cleaner j, weight percent

n = number of HAP equipment cleaners used

$VOL_{adh,k}$  = volume of adhesive k, gallons per year

$D_{adh,k}$  = density of adhesive k, pounds per gallon

$WT_{HAPadh,k}$  = HAP content of adhesive k, weight percent

o = number of adhesives used

**§ 63.1291 Compliance schedule.**

(a) Existing affected sources shall be in compliance with all provisions of this subpart no later than October 8, 2001.

(b) New or reconstructed affected sources shall be in compliance with all provisions of this subpart upon initial startup.

**§ 63.1292 Definitions.**

All terms used in this subpart shall have the meaning given them in the Act, in subpart A of this part, and in this section. If a term is defined in subpart A and in this section, it shall have the meaning given in this section for purposes of this subpart.

*Auxiliary blowing agent, or ABA*, means a low-boiling point liquid added to assist foaming by generating gas beyond that resulting from the isocyanate-water reaction.

*Breakthrough* means that point in the adsorption step when the mass transfer zone (i.e., the section of the carbon bed where the HAP is removed from the carrier gas stream) first reaches the carbon bed outlet as the mass transfer zone moves down the bed in the direction of flow. The breakthrough point is characterized by the beginning of a sharp increase in the outlet HAP or organic compound concentration.

*Calibrate* means to verify the accuracy of a measurement device against a known standard. For the purpose of this subpart, there are two levels of calibration. The initial calibration includes the

verification of the accuracy of the device over the entire operating range of the device. Subsequent calibrations can be conducted for a point or several points in a limited range of operation that represents the most common operation of the device.

*Canned motor pump* means a pump with interconnected cavity housings, motor rotors, and pump casing. In a canned motor pump, the motor bearings run in the process liquid and all seals are eliminated.

*Carbon adsorption system* means a system consisting of a tank or container that contains a specific quantity of activated carbon. For the purposes of this subpart, a carbon adsorption system is used as a control device for storage vessels. Typically, the spent carbon bed does not undergo regeneration, but is replaced.

*Connector* means flanged, screwed, or other joined fittings used to connect two pipe lines or a pipe line and a piece of equipment. A common connector is a flange. Joined fittings welded completely around the circumference of the interface are not considered to be connectors for the purposes of this subpart.

*Cured foam* means flexible polyurethane foam with fully developed physical properties. A period of 12 to 24 hours from pour is typically required to completely cure foam, although mechanical or other devices are sometimes used to accelerate the curing process.

*Curing area* means the area in a slabstock foam production facility where foam buns are allowed to fully develop physical properties.

*Diaphragm pump* means a pump where the driving member is a flexible diaphragm made of metal, rubber, or plastic. In a diaphragm pump, there is no packing or seals that are exposed to the process liquid.

*Diisocyanate* means a compound containing two isocyanate groups per molecule. The most common diisocyanate compounds used in the flexible polyurethane foam industry are toluene diisocyanate (TDI) and methylene diphenyl diisocyanate (MDI).

*Flexible polyurethane foam* means a flexible cellular polymer containing urea and carbamate linkages in the chain backbone produced by reacting a diisocyanate, polyol, and water. Flexible polyurethane foams are open-celled, permit the passage of air through the foam, and possess the strength and flexibility to allow repeated distortion or compression under stress with essentially complete recovery upon removal of the stress.

*Flexible polyurethane foam process* means the equipment used to produce a flexible polyurethane foam product. For the purpose of this subpart, the flexible polyurethane foam process includes raw material storage; production equipment and associated piping, ductwork, etc.; and curing and storage areas.

*Foam fabrication process* means an operation for cutting or bonding flexible polyurethane foam pieces together or to other substrates.

*Grade of foam* means foam with a distinct combination of indentation force deflection (IFD) and density values.

*HAP ABA* means methylene chloride, or any other HAP compound used as an auxiliary blowing agent.

*HAP-based* means to contain 5 percent (by weight) or more of HAP. This applies to equipment cleaners (and mixhead flushes) and mold release agents. The concentration of HAP may be determined using EPA test method 18, material safety data sheets, or engineering calculations.

*High-pressure mixhead* means a mixhead where mixing is achieved by impingement of the high pressure streams within the mixhead.

*Indentation Force Deflection (IFD)* means a measure of the load bearing capacity of flexible polyurethane foam. IFD is generally measured as the force (in pounds) required to compress a 50 square inch circular indenter foot into a four inch thick sample, typically 15 inches square or larger, to 25 percent of the sample's initial height.

*In diisocyanate service* means a piece of equipment that contains or contacts a diisocyanate.

*In HAP ABA service* means a piece of equipment that contains or contacts a HAP ABA.

*Initial startup* means the first time a new or reconstructed affected source begins production of flexible polyurethane foam.

*Isocyanate* means a reactive chemical grouping composed of a nitrogen atom bonded to a carbon atom bonded to an oxygen atom; or a chemical compound, usually organic, containing one or more isocyanate groups.

*Magnetic drive pump* means a pump where an externally-mounted magnet coupled to the pump motor drives the impeller in the pump casing. In a magnetic drive pump, no seals contact the process fluid.

*Metering pump* means a pump used to deliver reactants, ABA, or additives to the mixhead.

*Mixhead* means a device that mixes two or more component streams before dispensing foam producing mixture to the desired container.

*Molded flexible polyurethane foam* means a flexible polyurethane foam that is produced by shooting the foam mixture into a mold of the desired shape and size.

*Mold release agent* means any material which, when applied to the mold surface, serves to prevent sticking of the foam part to the mold.

*Plant site* means all contiguous or adjoining property that is under common control, including properties that are separated only by a road or other public right-of-way. Common control includes properties that are owned, leased, or otherwise operated by the same entity, parent entity, subsidiary, or any combination thereof.

*Polyol*, for the purpose of this subpart, means a polyether or polyester polymer with more than one reactive hydroxyl group attached to the molecule.

*Rebond foam* means the foam resulting from a process of adhering small particles of foam (usually scrap or recycled foam) together to make a usable cushioning product. Various adhesives and bonding processes are used. A typical application for rebond foam is for carpet underlay.

*Rebond foam process* means the equipment used to produce a rebond foam product. For the purpose of this subpart, the rebond foam process includes raw material storage; production equipment and associated piping, ductwork, etc.; and curing and storage areas.

*Reconstructed source* means an affected source undergoing reconstruction, as defined in subpart A. For the purposes of this subpart, process modifications made to reduce HAP ABA emissions to meet the existing source requirements of this subpart shall not be counted in determining whether or not a change or replacement meets the definition of reconstruction.

*Recovery device* means an individual unit of equipment capable of and used for the purpose of recovering chemicals for use, reuse, or sale. Recovery devices include, but are not limited to, carbon adsorbers, absorbers, and condensers.

*Research and development process* means a laboratory or pilot plant operation whose primary purpose is to conduct research and development into new processes and products, where the operations are under the close supervision of technically trained personnel, and which is not engaged in the manufacture of products for commercial sale except in a de minimis manner.

*Run of foam* means a continuous production of foam, which may consist of several grades of foam.

*Sealless pump* means a canned-motor pump, diaphragm pump, or magnetic drive pump, as defined in this section.

*Slabstock flexible polyurethane foam* means flexible polyurethane foam that is produced in large continuous buns that are then cut into the desired size and shape.

*Slabstock flexible polyurethane foam production line* includes all portions of the flexible polyurethane foam process from the mixhead to the point in the process where the foam is completely cured.

*Storage vessel* means a tank or other vessel that is used to store diisocyanate or HAP ABA for use in the production of flexible polyurethane foam. Storage vessels do not include vessels with capacities smaller than 38 cubic meters (or 10,000 gallons).

*Transfer pump* means all pumps used to transport diisocyanate or HAP ABA that are not metering pumps.

*Transfer vehicle* means a railcar, tank truck, or other vehicle used to transport HAP ABA to the flexible polyurethane foam facility.

### **§ 63.1293 Standards for slabstock flexible polyurethane foam production.**

Each owner or operator of a new or existing slabstock affected source shall comply with §63.1294 and either paragraph (a) or (b) of this section:

(a) The emission point specific limitations in §§63.1295 through 63.1298; or

(b) For sources that use no more than one HAP as an ABA and an equipment cleaner, the source-wide emission limitation in §63.1299.

**§ 63.1294 Standards for slabstock flexible polyurethane foam production—diisocyanate emissions.**

Each new and existing slabstock affected source shall comply with the provisions of this section.

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

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

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

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

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

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

(1) The pump shall be a sealless pump; or

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

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

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

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

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

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

( 1 ) Tightening of packing gland nuts.

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

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

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

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

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

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

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

**§ 63.1295 Standards for slabstock flexible polyurethane foam production—HAP ABA storage vessels.**

Each owner or operator of a new or existing slabstock affected source complying with the emission point specific limitation option provided in §63.1293(a) shall control HAP ABA storage vessels in accordance with the provisions of this section.

(a) Each HAP ABA storage vessel shall be equipped with either a vapor balance system meeting the requirements in paragraph (b) of this section, or a carbon adsorption system meeting the requirements of paragraph (c) of this section.

(b) The storage vessel shall be equipped with a vapor balance system. The owner or operator shall ensure that the vapor return line from the storage vessel to the tank truck or rail car is connected during unloading.

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

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

(c) The storage vessel shall be equipped with a carbon adsorption system, meeting the monitoring requirements of §63.1303(a), that routes displaced vapors through activated carbon before discharging to the atmosphere. The owner or operator shall replace the existing carbon with fresh carbon upon indication of breakthrough before the next unloading event.

**§ 63.1296 Standards for slabstock flexible polyurethane foam production—HAP ABA equipment leaks.**

Each owner or operator of a new or existing slabstock affected source complying with the emission point specific limitation option provided in §63.1293(a) shall control HAP ABA emissions from leaks from transfer pumps, valves, connectors, pressure-relief valves, and open-ended lines in accordance with the provisions in this section.

(a) *Pumps.* Each pump in HAP ABA service shall be controlled in accordance with either paragraph (a)(1) or (a)(2) of this section.

(1) The pump shall be a sealless pump, or

(2) Each pump shall be monitored for leaks in accordance with paragraphs (a)(2)(i) and (ii) of this section. Leaks shall be repaired in accordance with paragraph (a)(2)(iii) of this section.

(i) Each pump shall be monitored quarterly to detect leaks by the method specified in §63.1304(a). If an instrument reading of 10,000 parts per million (ppm) or greater is measured, a leak is detected.

(ii) Each pump shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, a leak is detected.

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

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

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

( 1 ) Tightening of packing gland nuts.

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

(b) *Valves*. Each valve in HAP ABA service shall be monitored for leaks in accordance with paragraph (b)(1) of this section, except as provided in paragraphs (b)(3) and (4) of this section. Leaks shall be repaired in accordance with paragraph (b)(2) of this section.

(1) Each valve shall be monitored quarterly to detect leaks by the method specified in §63.1304(a). If an instrument reading of 10,000 parts per million or greater is measured, a leak is detected.

(2) When a leak is detected, the owner or operator shall repair the leak in accordance with the procedures in paragraphs (b)(2)(i) and (ii) of this section, except as provided in paragraph (f) of this section.

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

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

(A) Tightening of bonnet bolts;

(B) Replacement of bonnet bolts;

(C) Tightening of packing gland nuts; and

(D) Injection of lubricant into lubricated packing.

(3) Any valve that is designated as an unsafe-to-monitor valve is exempt from the requirements of paragraphs (b)(1) and (2) of this section if:

(i) The owner or operator of the valve determines that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with paragraphs (b)(1) and (2) of this section; and

(ii) The owner or operator of the valve has a written plan that requires monitoring of the valve as frequently as practicable during safe-to-monitor times. The plan shall also include requirements for repairing leaks as soon as possible after detection.

(iii) The owner or operator shall monitor the unsafe-to-monitor valve in accordance with the written plan, and

(iv) The owner or operator shall repair leaks in accordance with the written plan.

(4) Any valve that is designated as a difficult-to-monitor valve is exempt from the requirements of paragraphs (b)(1) and (2) of this section if:

(i) The owner or operator of the valve determines that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface or it is not accessible at any time in a safe manner;

(ii) The process within which the valve is located is an existing source, or the process within which the valve is located is a new source that has less than 3 percent of the total number of valves designated as difficult to monitor; and

(iii) The owner or operator of the valve develops a written plan that requires monitoring of the valve at least once per calendar year. The plan shall also include requirements for repairing leaks as soon as possible after detection.

(iv) The owner or operator shall monitor the difficult-to-monitor valve in accordance with the written plan, and

(v) The owner or operator shall repair leaks in accordance with the written plan.

(c) *Connectors*. Each connector in HAP ABA service shall be monitored for leaks in accordance with paragraph (c)(1) of this section, except as provided in paragraph (c)(3) of this section. Leaks shall be repaired in accordance with (c)(2) of this section, except as provided in paragraph (c)(4) of this section.

(1) Connectors shall be monitored at the times specified in paragraphs (c)(1)(i) through (iii) of this section to detect leaks by the method specified in §63.1304(a). If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.

(i) Each connector shall be monitored annually, and

(ii) Each connector that has been opened or has otherwise had the seal broken shall be monitored for leaks within the first 3 months after being returned to HAP ABA service.

(iii) If a leak is detected, the connector shall be monitored for leaks in accordance with paragraph (c)(1) of this section within the first 3 months after its repair.

(2) When a leak is detected, it shall be repaired in accordance with the procedures in paragraphs (c)(2)(i) and (ii) of this section, except as provided in paragraph (c)(4) and paragraph (f) of this section.

(i) The leak shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected.

(ii) A first attempt at repair shall be made no later than 5 calendar days after the leak is detected.

(3) Any connector that is designated as an unsafe-to-monitor connector is exempt from the requirements of paragraph (c)(1) of this section if:

(i) The owner or operator determines that the connector is unsafe to monitor because personnel would be exposed to an immediate danger as a result of complying with paragraph (c)(1) of this section; and

(ii) The owner or operator has a written plan that requires monitoring of the connector as frequently as practicable during safe-to-monitor periods.

(4) Any connector that is designated as an unsafe-to-repair connector is exempt from the requirements of paragraph (c)(2) of this section if:

(i) The owner or operator determines that repair personnel would be exposed to an immediate danger as a consequence of complying with paragraph (c)(2) of this section; and

(ii) The connector will be repaired as soon as practicable, but not later than 6 months after the leak was detected.

(d) *Pressure-relief devices.* Each pressure-relief device in HAP ABA service shall be monitored for leaks in accordance with paragraph (d)(1) of this section. Leaks shall be repaired in accordance with paragraph (d)(2) of this section.

(1) Each pressure-relief device in HAP ABA service shall be monitored within 5 calendar days by the method specified in §63.1304(a) if evidence of a potential leak is found by visual, audible, olfactory, or any other detection method. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected.

(2) When a leak is detected, the leak shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in paragraph (f) of this section. The owner or operator shall make a first attempt at repair no later than 5 calendar days after the leak is detected.

(e) *Open-ended valves or lines.* (1)(i) Each open-ended valve or line in HAP ABA service shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in paragraph (e)(4) of this section.

(ii) The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance or repair.

(2) Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.

(3) When a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply with paragraph (e)(1) of this section at all other times.

(4) Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of paragraphs (e)(1), (2), and (3) of this section.

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

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

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

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

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

**§ 63.1297 Standards for slabstock flexible polyurethane foam production—HAP ABA emissions from the production line.**

(a) Each owner or operator of a new or existing slabstock affected source complying with the emission point specific limitation option provided in §63.1293(a)(1) shall control HAP ABA emissions from the slabstock polyurethane foam production line in accordance with the provisions in this section. Compliance shall be determined on a rolling annual basis as described in paragraph (a)(1) of this section. As an alternative, the owner or operator can determine compliance on a monthly basis, as described in paragraph (a)(2) of this section.

(1) *Rolling annual compliance.* In determining compliance on a rolling annual basis, actual HAP ABA emissions shall be compared to allowable HAP ABA emissions for each consecutive 12-month period. The allowable HAP ABA emission level shall be calculated based on the production for the 12-month period, resulting in a potentially different allowable level for each 12-month period. Compliance shall be determined each month for the previous 12-month period. The compliance requirements are provided in paragraph (b) of this section.

(2) *Monthly compliance alternative.* As an alternative to determining compliance on a rolling annual basis, an owner or operator can determine compliance by comparing actual HAP ABA emissions to allowable HAP ABA emissions for each month. The allowable HAP ABA emission level shall be calculated based on the production for the month, resulting in a potentially different allowable level each month. The requirements for this monthly compliance alternative are provided in paragraph (c) of this section.

(3) Each owner or operator electing to change between the compliance methods described under paragraphs (a)(1) and (a)(2) of this section shall notify the Administrator no later than 180 calendar days prior to the change.

(b) *Rolling annual compliance.* At each slabstock foam production source complying with the rolling annual compliance provisions described in paragraph (a)(1) of this section, actual HAP ABA emissions shall not exceed the allowable HAP ABA emission level for a consecutive 12-

month period. The actual HAP ABA emission level for a consecutive 12-month period shall be determined using the procedures in paragraph (b)(1) of this section, and the allowable HAP ABA emission level for the corresponding 12-month period shall be calculated in accordance with paragraph (b)(2) of this section.

(1) The actual HAP ABA emissions for a 12-month period shall be calculated as the sum of actual monthly HAP ABA emissions for each of the individual 12 months in the period. Actual monthly HAP ABA emissions shall be equal to the amount of HAP ABA added to the slabstock foam production line at the mixhead, determined in accordance with §63.1303(b), unless a recovery device is used. Slabstock foam production sources using recovery devices to reduce HAP ABA emissions shall determine actual monthly HAP ABA emissions using the procedures in paragraph (e) of this section.

(2) The allowable HAP ABA emissions for a consecutive 12-month period shall be calculated as the sum of allowable monthly HAP ABA emissions for each of the individual 12 months in the period. Allowable HAP ABA emissions for each individual month shall be calculated using Equation 2.

$$emiss_{allow, month} = \sum_{j=1}^m \left( \sum_{i=1}^n \frac{(limit_i) (polyol_i)}{100} \right)_j \quad (\text{Equation 2})$$

Where:

$emiss_{allow, month}$  = Allowable HAP ABA emissions from the slabstock foam production source for the month, pounds.

$m$  = Number of slabstock foam production lines.

$polyol_i$  = Amount of polyol used in the month in the production of foam grade  $i$  on foam production line  $j$ , determined in accordance with paragraph (b)(3) of this section, pounds.

$n$  = Number of foam grades produced in the month on foam production line  $j$ .

$limit_i$  = HAP ABA formulation limit for foam grade  $i$ , parts HAP ABA per 100 parts polyol. The HAP ABA formulation limits are determined in accordance with paragraph (d) of this section.

(3) The amount of polyol used for specific foam grades shall be based on the amount of polyol added to the slabstock foam production line at the mixhead, determined in accordance with the provisions of §63.1303(b).

(c) *Monthly compliance alternative.* At each slabstock foam production source complying with the monthly compliance alternative described in paragraph (a)(2) of this section, actual HAP ABA emissions shall not exceed the corresponding allowable HAP ABA emission level for the same month. The actual monthly HAP ABA emission level shall be determined using the procedures in paragraph (c)(1) of this section, and the allowable monthly HAP ABA emission level shall be calculated in accordance with paragraph (c)(2) of this section.

(1) The actual monthly HAP ABA emissions shall be equal to the amount of HAP ABA added to the slabstock foam production line at the mixhead, determined in accordance with §63.1303(b), unless a recovery device is used. Slabstock foam production sources using recovery devices to reduce HAP ABA emissions shall determine actual monthly HAP ABA emissions using the procedures in paragraph (e) of this section.

(2) The allowable HAP ABA emissions for the month shall be determined in accordance with Equation 2 of this section.

(d) *HAP ABA formulation limitations.* For each grade, the HAP ABA formulation limitation shall be determined in accordance with paragraphs (d)(1) through (d)(3) of this section. For any grade, the owner or operator may designate zero as the HAP ABA formulation limitation and not determine the HAP ABA formulation limitation in accordance with paragraphs (d)(1) through (d)(3) of this section.

(1) For existing sources, the HAP ABA formulation limitation for each grade of slabstock foam produced shall be determined using Equation 3 of this section. Zero shall be the formulation limitation for any grade of foam where the result of the formulation limitation equation (Equation 3) is negative (i.e., less than zero).

$$ABA_{\text{limit}} = -0.25(IFD) - 19.1\left(\frac{1}{IFD}\right) - 16.2(DEN) - 7.56\left(\frac{1}{DEN}\right) + 36.5 \quad (\text{Equation 3})$$

Where:

$ABA_{\text{limit}}$  = HAP ABA formulation limitation, parts HAP ABA allowed per hundred parts polyol (pph).

IFD = Indentation force deflection, pounds.

DEN = Density, pounds per cubic foot.

(2) For new sources, the HAP ABA formulation limitation for each grade of slabstock foam produced shall be determined as described in paragraphs (d)(2)(i) through (d)(2)(iv) of this section and in Table 1 of this subpart.

(i) For each foam grade with a density of 0.95 pounds per cubic foot or less, the HAP ABA formulation limitation shall be determined using Equation 3. Zero shall be the formulation limitation for any grade of foam where the result of the formulation limitation equation (Equation 3 of this section) is negative (i.e., less than zero).

(ii) For each foam grade with a density of 1.4 pounds per cubic foot or less, and an IFD of 15 pounds or less, the HAP ABA formulation limitation shall be determined using Equation 3.

(iii) For each foam grade with a density greater than 0.95 pounds per cubic foot and an IFD greater than 15 pounds, the HAP ABA formulation limitation shall be zero.

(iv) For each foam grade with a density greater than 1.40 pounds per cubic foot, the HAP ABA formulation limitation shall be zero.

(3) With the exception of those grades for which the owner or operator has designated zero as the HAP ABA formulation limitation, the IFD and density for each foam grade shall be determined in accordance with §63.1304(b) and recorded in accordance with §63.1307(c)(1)(i)(B) or §63.1307(c)(2)(i)(B) within 10 working days of the production of the foam.

(e) *Compliance using recovery devices.* If a recovery device is used to comply with paragraphs (b) or (c) of this section, the owner or operator shall determine the allowable HAP ABA emissions for each month using Equation 2 in paragraph (b)(2) of this section, and the actual monthly HAP

ABA emissions in accordance with paragraph (e)(1) of this section. The owner or operator shall also comply with the provisions of paragraph (e)(2) of this section.

(1) The actual monthly HAP ABA emissions shall be determined using Equation 4:

$$E_{\text{actual}} = E_{\text{unc}} - \text{HAPABA}_{\text{recovered}} \quad (\text{Equation 4})$$

Where:

$E_{\text{actual}}$  = Actual HAP ABA emissions after control, pounds/month.

$E_{\text{unc}}$  = Uncontrolled HAP ABA emissions, pounds/month, determined in accordance with paragraph (b)(1) of this section.

$\text{HAPABA}_{\text{recovered}}$  = HAP ABA recovered, pounds/month, determined in accordance with paragraph (e)(2) of this section.

(2) The amount of HAP ABA recovered shall be determined in accordance with §63.1303(c).

**§ 63.1298 Standards for slabstock flexible polyurethane foam production—HAP emissions from equipment cleaning.**

Each owner or operator of a new or existing slabstock affected source complying with the emission point specific limitation option provided in §63.1293(a)(1) shall not use a HAP or a HAP-based material as an equipment cleaner.

**§ 63.1299 Standards for slabstock flexible polyurethane foam production—source-wide emission limitation.**

Each owner or operator of a new or existing slabstock affected source complying with the source-wide emission limitation option provided in §63.1293(b) shall control HAP ABA storage and equipment leak emissions, HAP ABA emissions from the production line, and equipment cleaning HAP emissions in accordance with the provisions in this section. Compliance shall be determined on a rolling annual basis in accordance with paragraph (a) of this section. As an alternative, the owner or operator can determine compliance monthly, as described in paragraph (b) of this section.

(a) *Rolling annual compliance.* Under the rolling annual compliance provisions, actual source-wide HAP ABA storage and equipment leak emissions, HAP ABA emissions from the production line, and equipment cleaning HAP emissions are compared to allowable source-wide emissions for each consecutive 12-month period. The allowable source-wide HAP emission level is calculated based on the production for the 12-month period, resulting in a potentially different allowable level for each 12-month period. While compliance is on an annual basis, compliance shall be determined monthly for the preceding 12-month period. The actual source-wide HAP emission level for a consecutive 12-month period shall be determined using the procedures in paragraphs (c)(1) through (4) of this section, unless a recovery device is used. Slabstock foam production sources using recovery devices shall determine actual source-wide HAP emissions in accordance with paragraph (e) of this section. The allowable HAP emission level for a consecutive 12-month period shall be determined using the procedures in paragraph (d) of this section.

(b) *Monthly compliance alternative.* As an alternative to determining compliance on a rolling annual basis, an owner or operator can determine compliance by comparing actual HAP

emissions to allowable HAP emissions for each month. The allowable source-wide emission level is calculated based on the production for the month, resulting in a potentially different allowable level each month. The actual monthly emission level shall be determined using the procedures in paragraphs (c)(1) through (3) of this section, unless a recovery device is used. Slabstock foam production sources using recovery devices shall determine actual source-wide HAP emissions in accordance with paragraph (e) of this section. The allowable monthly HAP ABA emission level shall be determined in accordance with Equation 6.

(c) *Procedures for determining actual source-wide HAP emissions.* The actual source-wide HAP ABA storage and equipment leak emissions, HAP ABA emissions from the production line, and equipment cleaning HAP emissions shall be determined using the procedures in this section. Actual source-wide HAP emissions for each individual month shall be determined using the procedures specified in paragraphs (c)(1) through (3) of this section.

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

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

Where:

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

n = Number of HAP ABA storage vessels.

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

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

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

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

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

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

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

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

Where:

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

$m$  = Number of slabstock foam production lines.

$polyol_i$  = Amount of polyol used in the month in the production of foam grade  $i$  on foam production line  $j$ , determined in accordance with §63.1303(b), pounds.

$n$  = Number of foam grades produced in the month on foam production line  $j$ .

$limit_i$  = HAP ABA formulation limit for foam grade  $i$ , parts HAP ABA per 100 parts polyol. The HAP ABA formulation limits are determined in accordance with §63.1297(d).

(e) *Compliance using recovery devices.* If a recovery device is used to comply with paragraphs (a) or (b) of this section, the owner or operator shall determine the allowable source-wide HAP emissions for each month using Equation 6 in paragraph (d) of this section, and the actual monthly source-wide HAP emissions in accordance with paragraph (e)(1) of this section. The owner or operator shall also comply with the provisions of paragraph (e)(2) of this section.

(1) Actual monthly source-wide HAP emissions shall be determined using Equation 7.

$$E_{actual} = E_{unc} - HAPABA_{recovered} \quad (Equation 7)$$

Where:

$E_{actual}$  = Actual source-wide HAP emissions after control, pounds/month.

$E_{unc}$  = Uncontrolled source-wide HAP emissions, pounds/month, determined in accordance with paragraph (c) (1) through (3) of this section.

$HAPABA_{recovered}$  = HAP ABA recovered, pounds/month, determined in accordance with paragraph (e)(2) of this section.

(2) The amount of HAP ABA recovered shall be determined in accordance with §63.1303(c).

### § 63.1300 Standards for molded flexible polyurethane foam production.

Each owner or operator of a new or existing molded affected source shall comply with the provisions in paragraphs (a) and (b) of this section.

(a) A HAP or HAP-based material shall not be used as an equipment cleaner to flush the mixhead, nor shall it be used elsewhere as an equipment cleaner in a molded flexible polyurethane foam process, with the following exception. Diisocyanates may be used to flush the mixhead and associated piping during periods of startup or maintenance, provided that the diisocyanate compounds are contained in a closed-loop system and are re-used in production.

(b) A HAP-based mold release agent shall not be used in a molded flexible polyurethane foam source process.

**§ 63.1301 Standards for rebond foam production.**

Each owner or operator of a new or existing rebond foam affected source shall comply with the provisions in paragraphs (a) and (b) of this section.

(a) A HAP or HAP-based material shall not be used as an equipment cleaner at a rebond foam source.

(b) A HAP-based mold release agent shall not be used in a rebond foam source.

**§ 63.1302 Applicability of subpart A requirements.**

The owner or operator of an affected source shall comply with the applicable requirements of subpart A of this part, as specified in Table 2 of this subpart.

**§ 63.1303 Monitoring requirements.**

Owners and operators of affected sources shall comply with each applicable monitoring provision in this section.

(a) *Monitoring requirements for storage vessel carbon adsorption systems.* Each owner or operator using a carbon adsorption system to meet the requirements of §63.1294(a) or §63.1295 shall monitor the concentration level of the HAP or the organic compounds in the exhaust vent stream (or outlet stream exhaust) from the carbon adsorption system at the frequency specified in (a)(1) or (2) of this section in accordance with either (a)(3) or (4) of this section.

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

(2) As an alternative to monthly monitoring, the owner or operator can set the monitoring frequency at an interval no greater than 20 percent of the carbon replacement interval, which is established using a design analysis described below in paragraphs (a)(1)(i) through (iii) of this section.

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

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

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

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

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

(b) *Monitoring for HAP ABA and polyol added to the foam production line at the mixhead.* (1) The owner or operator of each slabstock affected source shall comply with the provisions in paragraph (b)(1)(i) of this section, and, if applicable, the provisions of paragraph (b)(1)(ii) of this section. Alternatively, the owner or operator may comply with paragraph (b)(5) of this section.

(i) Owners or operators of all slabstock affected sources shall continuously monitor the amount of polyol added at the mixhead when foam is being poured, in accordance with paragraphs (b)(2) through (4) of this section.

(ii) Owners or operators of slabstock foam affected sources using the emission point specific limitation option provided in §63.1293(a)(1) shall continuously monitor the amount of HAP ABA added at the mixhead when foam is being poured, in accordance with paragraphs (b)(2)(ii), (b)(3), and (b)(4) of this section.

(2) The owner or operator shall monitor either:

(i) Pump revolutions; or

(ii) Flow rate.

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

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

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

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

(5) As an alternative to the monitoring described in paragraphs (b)(2) through (4) of this section, the owner or operator may develop an alternative monitoring program. Alternative monitoring programs must be submitted to the Administrator for approval in the Precompliance Report as specified in §63.1306(c)(4) for existing sources or in the Application for approval of construction or reconstruction for new sources. If an owner or operator wishes to develop an alternative monitoring program after the compliance date, the program shall be submitted to the Administrator for approval before the owner or operator wishes to begin using the alternative program. If the Administrator does not notify the owner or operator of objections to the program, or any part of the program, within 45 days after its receipt, the program shall be deemed approved. Until the program is approved, the owner or operator of an affected source remains subject to the requirements of this subpart. The components of an alternative monitoring program shall include, at a minimum, the items listed in paragraphs (b)(5)(i) through (iv) of this section.

(i) A description of the parameter to be continuously monitored when foam is being poured to measure the amount of HAP ABA or polyol added at the mixhead.

(ii) A description of how the monitoring results will be recorded, and how the results will be converted into amount of HAP ABA or polyol delivered to the mixhead.

(iii) Data demonstrating that the monitoring device is accurate to within  $\pm 2.0$  percent.

(iv) Procedures to ensure that the accuracy of the parameter monitoring results is maintained. These procedures shall, at a minimum, consist of periodic calibration of all monitoring devices.

(c) *Recovered HAP ABA monitoring.* The owner or operator of each slabstock affected source using a recovery device to reduce HAP ABA emissions shall develop and comply with a recovered HAP ABA monitoring and recordkeeping program. The components of these plans shall include, at a minimum, the items listed in paragraphs (c)(1) through (5) of this section. These plans must be submitted for approval in accordance with paragraph (c)(6) of this section.

(1) A device, installed, calibrated, maintained, and operated according to the manufacturer's specifications, that indicates the cumulative amount of HAP ABA recovered by the solvent recovery device over each 1-month period. The device shall be certified by the manufacturer to be accurate to within  $\pm 2.0$  percent.

(2) The location where the monitoring will occur shall ensure that the measurements are taken after HAP ABA has been fully recovered (i.e., after separation from water introduced into the HAP ABA during regeneration).

(3) A description of the parameter to be monitored, and the times the parameter will be monitored.

(4) Data demonstrating that the monitoring device is accurate to within  $\pm 2.0$  percent.

(5) Procedures to ensure that the accuracy of the parameter monitoring results is maintained. These procedures shall, at a minimum, consist of periodic calibration of all monitoring devices.

(6) Recovered HAP ABA monitoring and recordkeeping programs must be submitted to the Administrator for approval in the Precompliance Report as specified in §63.1306(c)(6) for existing sources or in the Application for approval of construction or reconstruction for new sources. If an owner or operator wishes to develop a recovered HAP ABA monitoring program after the compliance date, the program shall be submitted to the Administrator for approval before the owner or operator wishes to begin using the program. If the Administrator does not notify the owner or operator of objections to the program within 45 days after its receipt, the program shall be deemed approved. Until the program is approved, the owner or operator of an affected source remains subject to the requirements of this subpart.

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

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

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

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

(e) *Monitoring of HAP ABA added to a storage vessel.* The amount of HAP ABA added to a storage vessel during a delivery shall be determined in accordance with either paragraphs (e)(1), (2), (3), or (4) of this section.

(1) The volume of HAP ABA added to the storage vessel shall be determined by recording the volume in the storage vessel prior to the delivery and the volume after the delivery, provided that the storage tank level measurement device used to determine the levels meets the criteria in (d) of this section.

(2) The volume of HAP ABA added to the storage vessel shall be determined by monitoring the flow rate using a device with an accuracy of  $\pm 2.0$  percent, and calibrated initially and at least once each six months thereafter.

(3) The weight of HAP ABA added to the storage vessel shall be calculated as the difference of the full weight of the transfer vehicle prior to unloading into the storage vessel and the empty weight of the transfer vehicle after unloading into the storage vessel. The weight shall be determined using a scale meeting the requirements of either paragraph (e)(2)(i) or (ii) of this section.

(i) A scale approved by the State or local agencies using the procedures contained in Handbook 44, Specifications, Tolerances, and Other Technical Requirements for Weighing and Measuring Devices 1998 (incorporation by reference—see §63.14).

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

(4) As an alternative to the monitoring options described in paragraphs (e)(1) through (e)(3) of this section, the owner or operator may develop an alternative monitoring program. Alternative monitoring programs must be submitted to the Administrator for approval in the Precompliance Report as specified in §63.1306(c)(4) for existing sources or in the Application for approval of construction or reconstruction for new sources. If an owner or operator wishes to develop an alternative monitoring program after the compliance date, the program shall be submitted to the Administrator for approval before the owner or operator wishes to begin using the alternative program. If the Administrator does not notify the owner or operator of objections to the program within 45 days after its receipt, the program shall be deemed approved. Until the program is approved, the owner or operator of an affected source remains subject to the requirements of this subpart. The components of an alternative monitoring program shall include, at a minimum, the items listed in paragraphs (e)(3)(i) through (iv) of this section.

(i) A description of the parameter to be monitored to determine the amount of HAP ABA added to the storage vessel during a delivery,

(ii) A description of how the results will be recorded, and how the results will be converted into the amount of HAP ABA added to the storage vessel during a delivery,

(iii) Data demonstrating that the monitoring device is accurate to within  $\pm 2.0$  percent, and

(iv) Procedures to ensure that the accuracy of the monitoring measurements is maintained. These procedures shall, at a minimum, consist of periodic calibration of all monitoring devices.

#### **§ 63.1304 Testing requirements.**

Owners and operators of affected sources shall use the test methods listed in this section, as applicable, to demonstrate compliance with this subpart.

(a) *Test method and procedures to determine equipment leaks.* Monitoring, as required under §63.1296, shall comply with the following requirements:

(1) Monitoring shall comply with Method 21 of 40 CFR part 60, appendix A.

(2) The detection instrument shall meet the performance criteria of Method 21 of 40 CFR part 60, appendix A, except that the instrument response factor criteria in section 3.1.2(a) of Method 21 shall be for the average composition of the source fluid, rather than for each individual VOC in the stream. For source streams that contain nitrogen, air, or other inerts which are not HAP or VOC, the average stream response factor shall be calculated on an inert-free basis. The response factor may be determined at any concentration for which monitoring for leaks will be conducted.

(3) The instrument shall be calibrated before use on each day of its use by the procedures specified in Method 21 of 40 CFR part 60, appendix A.

(4) Calibration gases shall be:

(i) Zero air (less than 10 ppm of hydrocarbon in air); and

(ii) A mixture of methane and air at a concentration of approximately, 1,000 ppm for all transfer pumps; and 500 ppm for all other equipment, except as provided in paragraph (a)(4)(iii) of this section.

(iii) The instrument may be calibrated at a higher methane concentration (up to 2,000 ppm) than the leak definition concentration for a specific piece of equipment for monitoring that piece of equipment. If the monitoring instrument's design allows for multiple calibration gas concentrations, then the lower concentration calibration gas shall be no higher than 2,000 ppm methane and the higher concentration calibration gas shall be no higher than 10,000 ppm methane.

(5) Monitoring shall be performed when the equipment is in HAP ABA service, in use with an acceptable surrogate volatile organic compound which is not a HAP ABA, or is in use with any other detectable gas or vapor.

(6) If no instrument is available onsite that will meet the performance criteria specified in section 3.1.2(a) of Method 21 of 40 CFR Part 60, appendix A, the readings from an available instrument may be adjusted by multiplying by the average response factor for the stream.

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

**§ 63.1305 Alternative means of emission limitation.**

An owner or operator of an affected source may request approval to use an alternative means of emission limitation, following the procedures in this section.

(a) The owner or operator can request approval to use an alternative means of emission limitation in the precompliance report for existing sources, the application for construction or reconstruction for new sources, or at any time.

(b) This request shall include a complete description of the alternative means of emission limitation.

(c) Each owner or operator applying for permission to use an alternative means of emission limitation under §63.6(g) shall be responsible for collecting and verifying data to demonstrate the emission reduction achieved by the alternative means of emission limitation.

(d) Use of the alternative means of emission limitation shall not begin until approval is granted by the Administrator in accordance with §63.6(g).

### **§ 63.1306 Reporting requirements.**

Owners and operators of affected sources shall comply with each applicable reporting provision in this section.

(a) *Initial notification.* Each affected source shall submit an initial notification in accordance with §63.9(b).

(b) *Application for approval of construction or reconstruction.* Each owner or operator shall submit an application for approval of construction or reconstruction in accordance with the provisions of §63.5(d).

(c) *Precompliance report.* Each slabstock affected source shall submit a precompliance report no later than 12 months before the compliance date. This report shall contain the information listed in paragraphs (c)(1) through (c)(8) of this section, as applicable.

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

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

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

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

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

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

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

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

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

(d) *Notification of compliance status.* Each affected source shall submit a notification of compliance status report no later than 180 days after the compliance date. For slabstock affected sources, this report shall contain the information listed in paragraphs (d)(1) through (3) of this section, as applicable. This report shall contain the information listed in paragraph (d)(4) of this section for molded foam processes and in paragraph (d)(5) for rebond foam processes.

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

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

(3) If the source is complying with the emission point specific limitations of §§63.1294 through 63.1298, the information listed in paragraphs (b)(3)(i) through (iii) of this section.

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

(ii) A list of pumps, valves, connectors, pressure-relief devices, and open-ended valves or lines in HAP ABA service.

(iii) A list of any modifications to equipment in HAP ABA service made to comply with the provisions of §63.1296.

(4) A statement that the molded foam affected source is in compliance with §63.1300, or a statement that molded foam processes at an affected source are in compliance with §63.1300.

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

(e) *Semiannual reports.* Each slabstock affected source shall submit a report containing the information specified in paragraphs (e)(1) through (5) of this section semiannually no later than 60 days after the end of each 180 day period. The first report shall be submitted no later than 240 days after the date that the Notification of Compliance Status is due and shall cover the 6-month period beginning on the date that the Notification of Compliance Status Report is due.

(1) For slabstock affected sources complying with the rolling annual compliance provisions of either §63.1297 or §63.1299, the allowable and actual HAP ABA emissions (or allowable and actual source-wide HAP emissions) for each of the 12-month periods ending on each of the six months in the reporting period. This information is not required to be included in the initial semi-annual compliance report.

(2) For sources complying with the monthly compliance alternative of either §63.1297 or §63.1299, the allowable and actual HAP ABA emissions (or allowable and actual source-wide HAP emissions) for each of the six months in the reporting period.

(3) For sources complying with the storage vessel provisions of §63.1294(a) or §63.1295 using a carbon adsorption system, unloading events that occurred after breakthrough was detected and before the carbon was replaced.

(4) Any equipment leaks that were not repaired in accordance with §63.1294(b)(2)(iii), §63.1294(c), §63.1296(a)(2)(iii), (b)(2), (b)(3)(iv), (b)(4)(v), (c)(2), (c)(4)(ii), and (d)(2).

(5) Any leaks in vapor return lines that were not repaired in accordance with §63.1294(a)(1)(ii) or §63.1295(b)(2).

(f) *Other reports.* (1) Change in selected emission limitation. An owner or operator electing to change their slabstock flexible polyurethane foam emission limitation (from emission point specific limitations to a source-wide emission limitation, or vice versa), selected in accordance with §63.1293, shall notify the Administrator no later than 180 days prior to the change.

(2) *Change in selected compliance method.* An owner or operator changing the period of compliance for either §63.1297 or §63.1299 (between rolling annual and monthly) shall notify the Administrator no later than 180 days prior to the change.

(g) *Annual compliance certifications.* Each affected source subject to the provisions in §§63.1293 through 63.1301 shall submit a compliance certification annually.

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

(2) A compliance certification required pursuant to a State or local operating permit program may be used to satisfy the requirements of this section, provided that the compliance certification is based on information consistent with that contained in §63.1308 of this section, and provided that the Administrator has approved the State or local operating permit program under part 70 of this chapter.

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

### **§ 63.1307 Recordkeeping requirements.**

The applicable records designated in paragraphs (a) through (c) of this section shall be maintained by owners and operators of all affected sources.

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

(2) For each slabstock affected source complying with the emission point specific limitations of §§63.1294 through 63.1298, a list of HAP ABA storage vessels, along with a record of the type of control utilized for each storage vessel.

(3) For storage vessels complying through the use of a carbon adsorption system, paragraph (a)(3)(i) or (ii), and paragraph (a)(3)(iii) of this section.

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

(ii) For affected sources monitoring at an interval no greater than 20 percent of the carbon replacement interval, in accordance with §63.1303(a)(2), the records listed in paragraphs (a)(3)(ii)(A) and (B) of this section.

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

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

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

(4) For storage vessels complying through the use of a vapor return line, paragraphs (a)(4)(i) through (iii) of this section.

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

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

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

(b) *Equipment leak records.* (1) A list of components as specified below in paragraphs (b)(1)(i) and (ii).

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

(ii) For affected sources complying with the emission point specific limitations of §§63.1294 through 63.1298, a list of components in HAP ABA service.

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

(3) When a leak is detected as specified in §63.1294(b)(2)(ii), §63.1294(c), §63.1296(a)(2), (b)(1), (c)(1), and (d)(1), the requirements listed in paragraphs (b)(3)(i) and (ii) of this section apply:

(i) Leaking equipment shall be identified in accordance with the requirements in paragraphs (b)(3)(i)(A) through (C) of this section.

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

(B) The identification on a valve may be removed after it has been monitored for 2-successive quarters as specified in §63.1296(b)(1) and no leak has been detected during those 2 quarters.

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

(ii) The information in paragraphs (b)(2)(ii)(A) through (H) shall be recorded for leaking components.

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

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

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

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

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

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

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

(H) The date the identification is removed.

(c) *HAP ABA records* —(1) *Emission point specific limitations—rolling annual compliance and monthly compliance alternative records.* Each slabstock affected source complying with the emission point specific limitations of §63.1294 through 63.1298, and the rolling annual compliance provisions of §63.1297(a)(1), shall maintain the records listed in paragraphs (c)(1)(i), (ii), (iii), and (iv) of this section. Each flexible polyurethane foam slabstock source complying with the emission point specific limitations of §§63.1294 through 63.1298, and the monthly compliance alternative of §63.1297(a)(2), shall maintain the records listed in paragraphs (c)(1)(i), (ii), and (iv) of this section.

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

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

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

(C) The amount of polyol added to the slabstock foam production line at the mixhead for each run of foam, determined in accordance with §63.1303(b).

(ii) Monthly records of the information listed in paragraphs (c)(1)(ii)(A) through (E) of this section.

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

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

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

(D) The total allowable HAP ABA emissions for the month, determined in accordance with §63.1297(b)(2).

(E) The total amount of HAP ABA added to the slabstock foam production line at the mixhead during the month, determined in accordance with §63.1303(b).

(iii) Each source complying with the rolling annual compliance provisions of §63.1297(b) shall maintain the records listed in paragraphs (c)(1)(iii)(A) and (B) of this section.

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

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

(iv) Records of all calibrations for each device used to measure polyol and HAP ABA added at the mixhead, conducted in accordance with §63.1303(b)(3).

*(2) Source-wide limitations—rolling annual compliance and monthly compliance alternative records.* Each slabstock affected source complying with the source-wide limitations of §63.1299, and the rolling annual compliance provisions in §63.1299(a), shall maintain the records listed in paragraphs (c)(2)(i) through (c)(2)(vii) of this section. Each flexible polyurethane foam slabstock source complying with the source-wide limitations of §63.1299, and the monthly compliance alternative of §63.1299(b), shall maintain the records listed in paragraphs (c)(2)(i) through (c)(2)(iii) and paragraphs (c)(2)(v) through (c)(2)(vii) of this section.

(i) Daily records of the information listed in paragraphs (c)(2)(i)(A) through (C) of this section.

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

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

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

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

(iii) Monthly records of the information listed below in paragraphs (c)(2)(iii)(A) through (E) of this section.

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

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

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

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

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

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

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

(iv) Each source complying with the rolling annual compliance provisions of §63.1299(a) shall maintain the records listed in paragraphs (c)(2)(iv)(A) and (B) of this section.

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

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

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

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

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

(d) The owner or operator of each affected source complying with §63.1297 or §63.1299 through the use of a recovery device shall maintain the following records:

(1) A copy of the recovered HAP ABA monitoring and recordkeeping program, developed pursuant to §63.1303(c);

(2) Certification of the accuracy of the monitoring device,

(3) Records of periodic calibration of the monitoring devices,

(4) Records of parameter monitoring results, and

(5) The amount of HAP ABA recovered each time it is measured.

(e) The owner or operator of an affected source subject to §63.1298 of this subpart shall maintain a product data sheet for each equipment cleaner used which includes the HAP content, in kg of HAP/kg solids (lb HAP/lb solids).

(f) The owner or operator of an affected source following the compliance methods in §63.1308(b)(1) and (c)(1) shall maintain records of each use of a vapor return line during unloading, of any leaks detected during unloading, and of repairs of leaks detected during unloading.

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

(h) The owner or operator of an affected source subject to §63.1300 or §63.1301 of this subpart shall maintain a product data sheet for each mold release agent used that includes the HAP content, in kg of HAP/kg solids (lb HAP/lb solids), of each mold release agent.

**§ 63.1308 Compliance demonstrations.**

(a) For each affected source, compliance with the requirements listed in paragraphs (a)(1) through (a)(2) of this section shall mean compliance with the requirements contained in §§63.1293 through 63.1301, absent any credible evidence to the contrary.

(1) The requirements described in Tables 3, 4, and 5 of this subpart; and

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

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

(1) For each affected source complying with §63.1294(a) in accordance with §63.1294(a)(1), each unloading event that occurs when the diisocyanate storage vessel is not equipped with a vapor return line from the storage vessel to the tank truck or rail car, each unloading event that occurs when the vapor line is not connected, each unloading event that the vapor line is not inspected for leaks as described in §63.1294(a)(1)(i), each unloading event that occurs after a leak has been detected and not repaired, and each calendar day after a leak is detected, but not repaired as soon as practicable;

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

(3) For each affected source complying with §63.1294(a) in accordance with §63.1294(a)(2) through the alternative monitoring procedures in §63.1303(a)(2), each unloading event that the diisocyanate storage vessel is not equipped with a carbon adsorption system, each time that the

carbon adsorption system is not monitored for breakthrough in accordance with §63.1303(a)(3) or (4) at the interval established in the design analysis, and each unloading event that occurs when the carbon is not replaced after an indication of breakthrough;

(4) For each affected source complying with §63.1294(b) in accordance with §63.1294(b)(1), each calendar day that a transfer pump in diisocyanate service is not a sealless pump;

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

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

(c) *Slabstock affected sources complying with the emission point specific limitations.* For slabstock affected sources complying with the emission point specific limitations as provided in §63.1293(a), failure to meet the requirements contained in §§63.1295 through 63.1298 shall be considered a violation of this subpart. Violation of each item listed in the paragraphs (c)(1) through (c)(17) of this section, as applicable, shall be considered a separate violation.

(1) For each affected source complying with §63.1295(a) in accordance with §63.1295(b), each unloading event that occurs when the HAP ABA storage vessel is not equipped with a vapor return line from the storage vessel to the tank truck or rail car, each unloading event that occurs when the vapor line is not connected, each unloading event that the vapor line is not inspected for leaks as described in §63.1295(b)(1), each unloading event that occurs after a leak has been detected and not repaired, and each calendar day after a leak is detected but not repaired as soon as practicable;

(2) For each affected source complying with §63.1295(a) in accordance with §63.1295(c), each unloading event that the HAP ABA storage vessel is not equipped with a carbon adsorption system, each unloading event (or each month if more than one unloading event occurs in a month) that the carbon adsorption system is not monitored for breakthrough in accordance with §63.1303(a)(3) or (4), and each unloading event that occurs when the carbon is not replaced after an indication of breakthrough ;

(3) For each affected source complying with §63.1295(a) in accordance with §63.1295(c) through the alternative monitoring procedures in §63.1303(a)(2), each unloading event that the HAP ABA storage vessel is not equipped with a carbon adsorption system, each time that the carbon adsorption system is not monitored for breakthrough in accordance with §63.1303(a)(3) or (4) at the interval established in the design analysis, and each unloading event that occurs when the carbon is not replaced after an indication of breakthrough;

(4) For each affected source complying with §63.1296(a) in accordance with §63.1296(a)(1), each calendar day that a transfer pump in HAP ABA service is not a sealless pump;

(5) For each affected source complying with §63.1296(a) in accordance with §63.1296(a)(2), each week that a visual inspection of a pump in HAP ABA service is not performed, each quarter

that a pump in HAP ABA service is not monitored to detect leaks in accordance with §63.1304(a), each calendar day after 5 calendar days after detection of a leak that a first attempt at repair has not been made in accordance with §63.1296(b)(2)(iii)(B), and the earlier of each calendar day after 15 calendar days after detection of a leak that a leak is not repaired, or if a leak is not repaired as soon as practicable, each subsequent calendar day (with the exception of situations meeting the criteria of §63.1296(f));

(6) For each affected source complying with §63.1296(b) in accordance with §63.1296(b)(1) and (2), each quarter that a valve in HAP ABA service is not monitored to detect leaks in accordance with §63.1304(a), each calendar day after 5 calendar days after detection of a leak that a first attempt at repair has not been made in accordance with §63.1296(b)(2)(ii), and each calendar day after 15 calendar days after detection of a leak that a leak is not repaired, or if a leak is not repaired as soon as practicable, whichever is earlier (with the exception of situations meeting the criteria of §63.1296(f));

(7) For each affected source complying with §63.1296(b)(3) for each valve designated as unsafe to monitor as described in §63.1296(b)(3)(i), failure to develop the written plan required by §63.1296(b)(3)(ii), each period specified in the written plan that an unsafe-to-monitor valve in HAP ABA service is not monitored, and each calendar day in which a leak is not repaired in accordance with the written plan;

(8) For each affected source complying with §63.1296(b)(4) for one or more valves designated as difficult-to-monitor in accordance with §63.1296(b)(4)(i) and (ii), failure to develop the written plan required by §63.1296(b)(4)(iii), each calendar year that a difficult-to-monitor valve in HAP ABA service is not monitored, and each calendar day in which a leak is not repaired in accordance with the written plan;

(9) For each affected source complying with §63.1296(c) in accordance with §63.1296(c)(1) and (2), each year that a connector in HAP ABA service is not monitored to detect leaks in accordance with §63.1304(a); each calendar day after 3 months after a connector has been opened, has otherwise had the seal broken, or a leak is repaired, that each connector in HAP ABA service is not monitored to detect leaks in accordance with §63.1304(a); each calendar day after 5 calendar days after detection of a leak that a first attempt at repair has not been made, and the earlier of each calendar day after 15 calendar days after detection of a leak that a leak is not repaired, or if a leak is not repaired as soon as practicable, each subsequent calendar day (with the exception of situations meeting the criteria of §63.1296(f));

(10) For each affected source complying with §63.1296(c)(3) for one or more connectors designated as unsafe-to-monitor in accordance with §63.1296(c)(3)(i), failure to develop the written plan required by §63.1296(c)(3)(ii), each period specified in the written plan that an unsafe-to-monitor valve in HAP ABA service is not monitored, each calendar day after 5 calendar days after detection of a leak of an unsafe-to-monitor connector that a first attempt at repair has not been made, and the earlier of each calendar day after 15 calendar days after detection of a leak that a leak is not repaired, or if a leak is not repaired as soon as practicable, each subsequent calendar day (with the exception of situations meeting the criteria of §63.1296(f));

(11) For each affected source complying with §63.1296(c)(4) for one or more connectors designated as unsafe to repair, each year that one or more unsafe-to-repair connectors in HAP ABA service is not monitored to detect leaks in accordance with §63.1304(a); each calendar day after 3 months after one or more unsafe-to-repair connectors has been opened, has otherwise had the seal broken, or a leak is repaired, that each unsafe-to-repair connector in HAP ABA service is not monitored to detect leaks in accordance with §63.1304(a); and the earlier of each calendar day after six-months after detection of a leak that a leak is not repaired, or if a leak is not repaired as soon as practicable, each subsequent calendar day;

(12) For each affected source complying with §63.1296(d) in accordance with §63.1296(d)(1) and (2), each calendar day after the 5 days that the pressure-relief device has not been monitored in accordance with §63.1304(a) after a potential leak was discovered as described in §63.1296(d)(1), each calendar day after 5 calendar days after detection of a leak that a first attempt at repair has not been made, and the earlier of each calendar day after 15 calendar days after detection of a leak that a leak is not repaired, or if a leak is detected and not repaired as soon as practicable, each subsequent calendar day (with the exception of situations meeting the criteria of §63.1296(f));

(13) For each affected source complying with §63.1296(e) in accordance with §63.1296(e)(1) through (5), each calendar day that an open-ended valve or line has no cap, blind flange, plug or second valve as described in §63.1296(e)(2), and each calendar day that a valve on the process fluid end of an open-ended valve or line equipped with a second valve is not closed before the second valve is closed;

(14) For each affected source complying with §63.1297(a) in accordance with the rolling annual compliance option in §63.1297(a)(1) and (b), each calendar day in the 12-month period for which the actual HAP ABA emissions exceeded the allowable HAP ABA emissions level, each calendar day in which foam is being poured where the amount of polyol added at the mixhead is not monitored (as required) in accordance with §63.1303(b)(1)(i), each calendar day in which foam is being poured where the amount of HAP ABA added at the mixhead is not monitored (as required) in accordance with §63.1303(b)(1)(ii), each calendar day in a 6-month period in which the polyol pumps are not calibrated in accordance with §63.1303(b)(3)(i), each calendar day in a month in which the HAP ABA pumps are not calibrated in accordance with §63.1303(b)(3)(ii), and each calendar day after 10 working days after production where the IFD and density of a foam grade are not determined (where required) in accordance with §63.1304(b);

(15) For each affected source complying with §63.1297(a) in accordance with the monthly compliance option in §63.1297(a)(2) and (c), each calendar day of each month for which the actual HAP ABA emissions exceeded the allowable HAP ABA emissions level for that month, each calendar day in which foam is being poured where the amount of polyol added at the mixhead is not monitored (as required) in accordance with §63.1303(b)(1)(i), each calendar day in which foam is being poured where the amount of HAP ABA added at the mixhead is not monitored (as required) in accordance with §63.1303(b)(1)(ii), each 6-month period in which the polyol pumps are not calibrated in accordance with §63.1303(b)(3)(i), each month in which the HAP ABA pumps are not calibrated in accordance with §63.1303(b)(3)(ii), and each calendar day after 10 working days after production where the IFD and density of a foam grade are not determined (where required) in accordance with §63.1304(b);

(16) For each affected source complying with §63.1297(a) by using a recovery device as allowed under §63.1297(e), the items listed in (c)(16)(i) or (ii) of this section, as applicable.

(i) If complying with rolling annual compliance option in §63.1297(a)(1) and (b), each item listed in (c)(14) of this section, failure to develop a recovered HAP ABA monitoring and recordkeeping program in accordance with §63.1303(c), and each instance when an element of the program is not followed.

(ii) If complying with the monthly compliance option in §63.1297(a)(2) and (c), each item listed in (c)(15) of this section, failure to develop a recovered HAP ABA monitoring and recordkeeping program in accordance with §63.1303(c), and each instance when an element of the program is not followed.

(17) For each affected source complying with §63.1298, each calendar day that a HAP or any HAP-based material is used as an equipment cleaner.

(d) *Slabstock affected sources complying with the source-wide emission limitation.* For slabstock affected sources complying with the source-wide emission limitation as provided in §63.1293(b), failure to meet the requirements contained in §63.1299 shall be considered a violation of this subpart. Violation of each item listed in the paragraphs (d)(1) through (d)(3) of this section, as applicable, shall be considered a separate violation.

(1) For each affected source complying with §63.1299 in accordance with the rolling annual compliance option in §63.1299(a), each calendar day in the 12-month period for which the actual HAP ABA emissions exceeded the allowable HAP ABA emissions level, each calendar day in which foam is being poured where the amount of polyol added at the mixhead is not monitored (as required) in accordance with §63.1303(b)(1)(i), each calendar day in a week in which the amount of HAP ABA in a storage vessel is not determined in accordance with §63.1303(d), each delivery of HAP ABA in which the amount of HAP ABA added to the storage vessel is not determined in accordance with §63.1303(e), each calendar day in a 6-month period in which the polyol pumps are not calibrated in accordance with §63.1303(b)(3)(i), and each calendar day after 10 working days after production where the IFD and density of a foam grade are not determined (where required) in accordance with §63.1304(b);

(2) For each affected source complying with §63.1299 in accordance with the monthly compliance option in §63.1299(b), each calendar day of each month for which the actual HAP ABA emissions exceeded the allowable HAP ABA emissions level for that month, each calendar day in which foam is being poured where the amount of polyol added at the mixhead is not monitored (as required) in accordance with §63.1303(b)(1)(i), each calendar day in a week in which the amount of HAP ABA in a storage vessel is not determined in accordance with §63.1303(d), each delivery of HAP ABA in which the amount of HAP ABA added to the storage vessel is not determined in accordance with §63.1303(e), and each calendar day in a 6-month period in which the polyol pumps are not calibrated in accordance with §63.1303(b)(3)(i), and each calendar day after 10 working days after production where the IFD and density of a foam grade are not determined (where required) in accordance with §63.1304(b).

(3) For each affected source complying with §63.1299 by using a recovery device as allowed under §63.1299(e), the items listed in (d)(3)(i) or (ii) of this section, as applicable.

(i) If complying with rolling annual compliance option in §63.1299(a), each item listed in (d)(1) of this section, failure to develop a recovered HAP ABA monitoring and recordkeeping program in accordance with §63.1303(c), and each instance when an element of the program is not followed.

(ii) If complying with the monthly compliance option in §63.1299(b), each item listed in (d)(2) of this section, failure to develop a recovered HAP ABA monitoring and recordkeeping program in accordance with §63.1303(c), and each instance when an element of the program is not followed.

(e) *Molded and rebond foam affected sources.* For molded and rebond foam affected sources, failure to meet the requirements contained in §63.1300 and §63.1301, respectively, shall be considered a violation of this subpart. Violation of each item listed in the following paragraphs shall be considered a separate violation.

(1) For each molded foam affected source subject to the provisions in §63.1300(a), each calendar day that a HAP-based material is used as an equipment cleaner (except for diisocyanates used to flush the mixhead and associated piping during periods of startup or maintenance, provided that the diisocyanate compounds are contained in a closed-loop system and are re-used in production);

(2) For each molded foam affected source subject to the provisions of §63.1300(b), each calendar day that a HAP-base material is used as a mold release agent;

(3) For each rebond foam affected source subject to the provisions of §63.1301(a), each calendar day that a HAP-based material is used as an equipment cleaner; and

(4) For each rebond foam affected source complying with §63.1301(b), each calendar day that a HAP-based mold release agent is used.

**§ 63.1309 Implementation and enforcement.**

(a) This subpart can be implemented and enforced by the U.S. EPA, or a delegated authority such as the applicable State, local, or Tribal agency. If the U.S. EPA Administrator has delegated authority to a State, local, or Tribal agency, then that agency, in addition to the U.S. EPA, has the authority to implement and enforce this subpart. Contact the applicable U.S. EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to a State, local, or Tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or Tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator of U.S. EPA and cannot be transferred to the State, local, or Tribal agency.

(c) The authorities that cannot be delegated to State, local, or Tribal agencies are as specified in paragraphs (c)(1) through (5) of this section.

(1) Approval of alternatives to the requirements in §§63.1290, 63.1291, 63.1293 through 63.1301, and 63.1305.

(2) Approval of major alternatives to test methods under §63.7(e)(2)(ii) and (f), as defined in §63.90, and as required in this subpart.

(3) Approval of major alternatives to monitoring under §63.8(f), as defined in §63.90, and as required in this subpart.

(4) Approval of alternatives to the specific monitoring requirements of §63.1303(b)(5).

(5) Approval of major alternatives to recordkeeping and reporting under §63.10(f), as defined in §63.90, and as required in this subpart.

[68 FR 37357, June 23, 2003]

**Appendix to Subpart III of Part 63—Tables: Note**

For the convenience of the readers of subpart III, the tables below summarize the requirements in §§63.1290 to 63.1307. These tables are intended to assist the reader in determining the requirements applicable to affected sources and do not alter an affected source's obligation to comply with the requirements in §§63.1290 to 63.1307.

**Table 1 to Subpart III of Part 63—HAP ABA Formulation Limitations Matrix for New Sources [see §63.1297(d)(2)]**

Values in parts ABA per hundred parts polyol		Density ranges (pounds per cubic foot)				
		0-0.95	0.96-1.05	1.06-1.15	1.16-1.40	1.41+
IFD	0-10	Use Equation 3				
	11-15					
	16-20	0				
	21-25					
	26-30					
	31+					

**Table 2 to Subpart III of Part 63—Applicability of General Provisions (40 CFR Part 63, Subpart A) to Subpart III**

Subpart A reference	Applies to subpart III	Comment
§63.1	YES	Except that §63.1(c)(2) is not applicable to the extent area sources are not subject to subpart III.
§63.2	YES	Definitions are modified and supplemented by §63.1292.
§63.3	YES	
§63.4	YES	
§63.5	YES	
§63.6 (a)–(d)	YES	
§63.6(e) (1)–(2)	YES	
§63.6(e)(3)	NO	Owners and operators of subpart III affected sources are not required to develop and implement a startup, shutdown, and malfunction plan.
§63.6 (f)–(g)	YES	
§63.6(h)	NO	Subpart III does not require opacity and visible emission standards.

§63.6 (i)–(j)	YES	
§63.7	NO	Performance tests not required by subpart III.
§63.8	NO	Continuous monitoring, as defined in subpart A, is not required by subpart III.
§63.9 (a)–(d)	YES	
§63.9 (e)–(g)	NO	
§63.9(h)	NO	Subpart III specifies Notification of Compliance Status requirements.
§63.9 (i)–(j)	YES	
§63.10 (a)–(b)	YES	Except that the records specified in §63.10(b)(2)(vi) through (xi) and (xiii) are not required.
§63.10(c)	NO	
§63.10(d)(1)	YES	
§63.10 (d) (2)–(3)	NO	
§63.10 (d) (4)–(5)	YES	
§63.10(e)	NO	
§63.10(f)	YES	
§63.11	YES	
§63.12	YES	
§63.13	YES	
§63.14	YES	
§63.15	YES	

**Table 3 to Subpart III of Part 63—Compliance Requirements for Slabstock Foam Production Affected Sources Complying with the Emission Point Specific Limitations**

<b>Emission point</b>	<b>Emission point compliance option</b>	<b>Emission, work practice, and equipment standards</b>	<b>Monitoring</b>	<b>Recordkeeping</b>	<b>Reporting</b>
Diisocyanate storage vessels §63.1294(a)	Vapor balance	§63.1294(a)(1) and (1)(ii)	§63.1294(a)(1)(i)	§63.1307(a)(1) and (4)	§63.1306(e)(5).

	Carbon adsorber	§63.1294(a)(2)	§63.1303(a)(1), (3), and (4)	§63.1307(a)(1), (3)(i), and (3)(iii)	§63.1306(e)(3).
	Carbon adsorber—alternative monitoring	§63.1294(a)(2)	§63.1303(a)(2), (3) and (4)	§63.1307(a)(1), (3)(ii), and (3)(iii)	§63.1306(e)(3).
Diisocyanate transfer pumps §63.1294(b)	Sealless pump	§63.1294(b)(1)		§63.1307 (b)(1)(i) and (2)	
	Submerged pump	§63.1294(b)(2)(i) and (iii)	§63.1294 (b)(2)(ii)	§63.1307 (b)(1)(i), (2), and (3)	§63.1306(e)(4).
Other components in diisocyanate service §63.1294(c)	N/A	§63.1294(c)	§63.1294(c)	§63.1307 (b)(1)(i) and (3)	§63.1306(e)(4).
HAP ABA storage vessels §63.1295	Vapor balance	§63.1295(b) and (b)(2)	§63.1295 (b)(1)	§63.1307(a)(2) and (4)	§63.1306(e)(5).
	Carbon adsorber	§63.1295(c)	§63.1303(a)(1), (3), and (4)	§63.1307(a)(2), (3)(i), (3)(iii)	§63.1306(e)(3).
	Carbon adsorber—alternative monitoring	§63.1295(c)	§63.1303(a)(2), (3) and (4)	§63.1307(a)(2), (3)(ii), and (3)(iii)	§63.1306(e)(3).
HAP ABA pumps §63.1296(a):	Sealless pump	§63.1296(a)(1)		§63.1307 (b)(1)(ii)	
	Quarterly monitoring	§63.1296(a)(2) and (2)(iii)	§63.1296(a)(2)(i), (2)(ii) and §63.1304(a)	§63.1307 (b)(1)(ii) and (3)	§63.1304(e)(4).
HAP ABA valves §63.1296(b):	Quarterly monitoring	§63.1296(b), and (b)(2)	§63.1296 (b)(1) and §63.1304(a)	§63.1307 (b)(1)(ii) and (3)	§63.1304(e)(4).

	Unsafe-to-monitor	§63.1296(b)(3) (i), (ii), and (iv)	§63.1296 (b)(3)(iii)	§63.1307 (b)(1)(ii), and (4)	§63.1304(e)(4).
	Difficult-to-monitor	§63.1296(b)(4) (i), (ii), (iii), and (v)	§63.1296(b)(4)(iv) and §63.1304(a)	§63.1307 (b)(1)(ii) and (4)	§63.1306(e)(4).
HAP ABA Connectors §63.1296(c):	Annual monitoring	§63.1296(c) and (c)(2)	§63.1296(c)(1) and §63.1304(a)	§63.1307 (b)(1)(ii) and (3)	§63.1306(e)(4).
	Unsafe-to-monitor	§63.1296(c)(2), (3) (i), and (ii)	§63.1296(c)(3) (iii) and §63.1304(a)	§63.1307 (b)(1)(ii) and (4)	§63.1306(e)(4).
	Unsafe-to-repair	§63.1296(c)(4)	§63.1296(c)(1)	§63.1307 (b)(1)(ii)	§63.1306(e)(4).
Pressure-relief devices §63.1296(d)	N/A	§63.1296(d) and (d)(2)	§63.1296 (d)(1) and §63.1304(a)	§63.1307 (b)(1)(ii) and (3)	§63.1306(e)(4).
Open-ended valves or lines §63.1296(e)	N/A	§63.1296(e)		§63.1307 (b)(1)(ii)	
Production line §63.1297	Rolling annual compliance	§63.1297(a)(1) and (b)	§63.1303 (b)	§63.1307(c)(1)	§63.1306(e)(1).
	Monthly compliance	§63.1297(a)(2) and (c)	§63.1303 (b)	§63.1307(c)(1)	§63.1306(e)(2).
	Compliance Using a Recovery device	§63.1297(a)(1), (b), and (e) for rolling annual compliance or §63.1297(a)(2), (c), and (e) for monthly compliance	§63.1303 (b) and (c)	§63.1307(c)(1) and (d)	§63.1306(e)(1) or (2).
Equipment Cleaning §63.1298	N/A	§63.1298		§63.1307(e)	

**Table 4 to Subpart III of Part 63—Compliance Requirements for Slabstock Foam Production Affected Sources Complying With the Source-Wide Emission Limitation**

<b>Emission point</b>	<b>Emission point compliance option</b>	<b>Emission, work practice, and equipment standards</b>	<b>Monitoring</b>	<b>Recordkeeping</b>	<b>Reporting</b>
Diisocyanate storage vessels §63.1294(a)	Vapor balance	§63.1294(a)(1) and (1)(ii)	§63.1294(a)(1)(i)	§63.1307(a)(1) and (4)	§63.1306(e)(5).
	Carbon adsorber	§63.1294(a)(2)	§63.1303(a)(1), (3), and (4)	§63.1307(a)(1), (3)(i), and (3)(iii)	§63.1306(e)(3).
	Carbon adsorber—alternative monitoring	§63.1294(a)(2)	§63.1303(a)(2), (3) and (4)	§63.1307(a)(1), (3)(ii), and (3)(iii)	§63.1306(e)(3).
Diisocyanate transfer pumps §63.1294(b)	Sealless pump	§63.1294(b)(1)		§63.1307 (b)(1)(i) and (2)	
	Submerged pump	§63.1294(b)(2)(i) and (iii)	§63.1294 (b)(2)(ii)	§63.1307 (b)(1)(i), (2), and (3)	§63.1306(e)(4).
Other components in diisocyanate service §63.1294(c)	N/A	§63.1294(c)	§63.1294(c)	§63.1307 (b)(1)(i) and (3)	§63.1306(e)(4).
HAP ABA storage vessels, equipment leaks, production line, and equipment cleaning	Rolling annual compliance	§63.1299(a), (c)(1) through (4), and (d)	§63.1303 (b) except (b)(1)(ii), (d), and (e)	§63.1307(c)(2)	§63.1306(e)(1).
	Monthly compliance	§63.1299(b), (c)(1) through	§63.1303 (b) except (b)(1)(ii),	§63.1307(c)(2)	§63.1306(e)(2).

		(4), and (d)	(d), and (e)		
	Compliance Using a Recovery device	§63.1299(a), (d), and (e) for rolling annual compliance or §63.1299(b), (d), and (e) for monthly compliance	§63.1303 (b) except (b)(1)(ii) and (c)	§63.1307(c)(2) and (d)	§63.1306(e)(1) or (2).

**Table 5 to Subpart III of Part 63—Compliance Requirements for Molded and Rebond Foam Production Affected Sources**

<b>Emission point</b>	<b>Emission point compliance option</b>	<b>Emission, work practice, and equipment standards</b>	<b>Monitoring</b>	<b>Recordkeeping</b>	<b>Reporting</b>
Molded Foam					
Equipment cleaning	N/A	§63.1300(a)		§63.1307(g)	
Mold release agent	N/A	§63.1300(b)		§63.1307 (h)	
Rebond Foam					
Equipment cleaning	N/A	§63.1301(a)		§63.1307 (g)	
Mold release agent	N/A	§63.1301(b)		§63.1307 (h)	

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

Addendum to the  
Technical Support Document for a Part 70 Operating Permit Renewal

<b>Source Name:</b>	Foamex Innovations, Inc.
<b>Source Location:</b>	2211 South Wayne Street, Auburn, Indiana 46706
<b>County:</b>	DeKalb
<b>SIC Code:</b>	3086
<b>Permit Renewal No.:</b>	T033-27355-00047
<b>Permit Reviewer:</b>	Stephanie Wilkerson

On June 3, 2009, the Office of Air Quality (OAQ) had a notice published in the Auburn Evening Star in Auburn, Indiana, stating that Foamex Innovations, Inc., had applied for a Part 70 Operating Permit renewal for a stationary flexible polyurethane foam production and foam processing plant. The notice also stated that OAQ proposed to issue a permit renewal for this operation and provided information on how the public could review the proposed permit renewal 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 renewal should be issued as proposed.

Comments from Ms. Catherine Mowery on behalf of Foamex Innovations, Inc., were received regarding the issuance of this permit renewal. Additionally, applications for two (2) Administrative Amendments to the renewal permit were received on June 2, 2009, and June 30, 2009, respectively. Those changes requested shall be incorporated into the Part 70 Operating Permit Renewal as described below.

The summary of the administrative amendments, comments, and corresponding responses is as follows (**bold** language has been added and ~~struck~~ language has been deleted). The Technical Support Document for the permit renewal will not be altered, as all changes will be documented in this Addendum.

***Comments on Part 70 Operating Permit Renewal T033-27355-00047***

**Comments:**

For Condition D.1.3 of the permit, it should read ..."in accordance with Section B"... and not Section C for the Preventive Maintenance Plan requirements.

Additionally, the wording in Condition D.1.3 of the permit implies that a Preventive Maintenance Plan is required for the rebond units, the source-wide adhesive application, the source-wide chemical cleaning solvent usage, the VPF line, and the carbon adsorbers. The current permit only requires a Preventive Maintenance Plan for the VPF line and any control devices.

**Response 1:**

The reference in the Condition has been updated as noted. A Preventive Maintenance Plan is required for the rebond mold units and the VPF line with its controls.

The permit has been modified as follows:

...  
D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-7-5(13)]

---

A Preventive Maintenance Plan, in accordance with Section ~~CB~~ - Preventive Maintenance Plan, of this permit, is required for ~~these facilities~~ **the rebond mold units, the VPF line, and any associated control devices.**

...

**Administrative Amendments**

- (a) On June 2, 2009, the Office of Air Quality received an application from Foamex Innovations, Inc., to install one (1) quick cool unit, identified as QC-01, at the facility. Pursuant to 326 IAC 2-7-11(a)(8)(A), an exempt unit may be incorporated into a Part 70 Operating Permit as an Administrative Amendment.

Trial run samplings of a prototype quick cool unit were conducted by the source, and the potential emissions from the proposed unit are 2.44 tons/year of VOC and 0.024 tons/year of HAPs. These potential emissions are less than the exemption thresholds in 326 IAC 2-1.1-3(e)(1), and there are no specific state or federal requirements applicable to this new unit. Therefore, this unit shall be administratively incorporated into the permit as follows:

...  
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

---

This stationary source also includes the following insignificant activities:

- ...  
(aa) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations; [326 IAC 6-3-2] ~~and~~
- (bb) Laboratory emissions:
- (1) Product test burning; **and**
- (cc) **One (1) quick cool unit, identified as QC-01, constructed in 2009, with a maximum production capacity of twenty (20) batches of foam buns per hour, and exhausting to stack 37 (S/V ID 37).**
- ...

- (b) On June 30, 2009, the Office of Air Quality received an application from Foamex Innovations, Inc., to confirm a change of ownership and name for the Auburn facility permitted with Part 70 Operating Permit Renewal T033-27355-00047. The name change from Foamex, L.P., to Foamex Innovations, Inc., has been made throughout the permit renewal without duplication herein.

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

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>Foamex, L.P.</b>
<b>Source Location:</b>	<b>2211 South Wayne Street, Auburn, Indiana 46706</b>
<b>County:</b>	<b>DeKalb</b>
<b>SIC Code:</b>	<b>3086</b>
<b>Permit Renewal No.:</b>	<b>T033-27355-00047</b>
<b>Permit Reviewer:</b>	<b>Stephanie Wilkerson</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Foamex, L.P., relating to the operation of a stationary flexible polyurethane foam production and foam processing plant.

**History**

On January 12, 2009, Foamex, L.P., submitted an application to the OAQ requesting to renew its operating permit. Foamex, L.P., was issued its first Part 70 Operating Permit Renewal on October 13, 2004. Foamex, L.P. received its original Part 70 Operating Permit on November 11, 1998.

**Permitted Emission Units and Pollution Control Equipment**

- (a) Four (4) rebond mold units, identified as EU-R1, EU-R2, EU-R3, and EU-R4, with a total maximum capacity of bonding 9.6 tons per hour of scrap foam. Each mold unit has an associated dryer (total of four (4) dryers). Each mold unit exhausts through one (1) separate stack. There are a total of eight (8) exhaust stacks (28a, 28b, 29a, 29b, 35a, 35b, 36a, 36b) that serve each mold unit and each dryer.
- (b) One (1) source-wide adhesive application operation, with emissions venting inside the plant;
- (c) One (1) source-wide chemical cleaning solvent usage operation, with emissions venting inside the plant;
- (d) One (1) Variable Pressure Foaming (VPF) line, constructed in 2001 and modified in 2005, with a maximum production rate of 1.2 billion board feet of foam per twelve (12) consecutive month period, using carbon adsorbers as control, and exhausting to Stacks 39 and 40. The flexible foam is produced by the mix of TDI and/or MDI with polyol and/or resin and other chemicals, including amines, tins, silicones, and fillers; and
- (e) Three (3) natural gas-fired industrial boilers identified as Boilers #1, #2 and #3 (EU-B1, EU-B2, EU-B3), each rated at 10.5 million (MM) British thermal units (Btu) per hour and exhausted through three (3) stacks (S/V ID 31,32,33), respectively. Boilers #1 and #2 were installed in 1978 and Boiler #3 was installed in 1986.

**Insignificant Activities**

- (a) Natural gas fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
  - (1) Decommissioned 2.1 MMBtu/hour natural gas-fired boiler;

- (b) Propane or liquefied petroleum gas, or butane fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour;
- (c) 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; and
  - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (d) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6:
  - (1) One (1) 100% petroleum distillate Safety-Kleen parts washer, installed in 2002, with a remote solvent reservoir; [326 IAC 8-3-2]
- (e) Cleaners and solvents characterized as follows:
  - (1) having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psi measured at 38 degrees Celsius (100°F) or
  - (2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees Celsius (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per twelve (12) months;
- (f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment; [326 IAC 6-3-2]
- (g) Closed loop heating and cooling systems:
  - (1) One (1) glycol chiller system;
- (h) Infrared cure equipment:
  - (1) One (1) laminator equipped with an infrared heating unit;
- (i) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;
- (j) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (k) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (l) Heat exchanger cleaning and repair;
- (m) Process vessel degassing and cleaning to prepare for internal repairs;
- (n) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4]
- (o) Blowdown of any of the following: sight glass; boiler; compressors; pumps; and cooling tower;

- (p) Gasoline emergency generators not exceeding 110 horsepower;
- (q) Stationary fire pumps;
- (r) Purge double block and bleed valves;
- (s) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kPa measured at 38 degrees Celsius (100°F));
- (t) Two (2) Baumer loop slitters using an n-propyl bromide-based adhesive;
- (u) The following units emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:
  - (1) TDI/MDI Storage Tanks and TDI Doper Tank, all equipped with carbon drums; [40 CFR 63, Subpart III]
  - (2) Filler handling and storage;
  - (3) Hot wire seamers; and
  - (4) Two (2) hot roll laminators;
- (v) The following activities not previously identified with emissions equal to or less than insignificant thresholds:
  - (1) Ink handling and applications - VOC emissions less than three (3) lbs/hr or fifteen (15) lbs/day;
  - (2) Resin storage tanks (polyol tanks) - VOC emissions less than three (3) lbs/hr or fifteen (15) lbs/day;
  - (3) Amines storage tanks - VOC emissions less than three (3) lbs/hr or fifteen (15) lbs/day;
  - (4) Fire retardant storage tanks - VOC emissions less than three (3) lbs/hr or fifteen (15) lbs/day;
  - (5) Two (2) hot roll (drum) laminators - VOC emissions less than three (3) lbs/hr or fifteen (15) lbs/day;
  - (6) Process oil storage tanks - VOC emissions less than three (3) lbs/hr or fifteen (15) lbs/day;
  - (7) Binder storage tanks - VOC emissions less than three (3) lbs/hr or fifteen (15) lbs/day; and
  - (8) Binder blend tanks - VOC emissions less than three (3) lbs/hr or fifteen (15) lbs/day.
- (w) Bun cutters; [326 IAC 6-3-2]
- (x) BSV slitters; [326 IAC 6-3-2]
- (y) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone; [326 IAC 6-3-2]

- (z) One (1) rebond granulation area, equipped with a cyclone and a dusthouse for particulate control; [326 IAC 6-3-2]
- (aa) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations; [326 IAC 6-3-2] and
- (bb) Laboratory emissions:
  - (1) Product test burning.

### Existing Approvals

Since the issuance of the Part 70 Operating Permit Renewal (033-17552-00047) on October 13, 2004, the source has constructed or has been operating under the following approvals as well:

- (a) Significant Source Modification No. 033-20970-00047, issued October 25, 2005; and
- (b) Significant Permit Modification No. 033-21341-00047, issued November 8, 2005.

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

The following terms and conditions from previous approvals have been revised in this Part 70 Operating Permit Renewal:

- (a) HAP Emissions

In the previous renewal, the source used methylene chloride as a blowing agent as part of the VPF line operations. Due to advances in methodologies and formulations, the source no longer uses methylene chloride in any process. This change drops the source below major source thresholds for HAPs.

- (b) NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR 63, Subpart DDDDD)

On July 30, 2007, the Court of Appeals for the District of Columbia Circuit issued its mandate in *NRDC v. EPA*, vacating and remanding EPA's CISWI Definitions Rule and the Boilers Rule. Therefore, these requirements have been removed from the permit.

- (c) Testing Requirements

The testing requirements for VOC and particulate matter emissions from the four (4) rebond mold units have been deemed unnecessary at this time. The source no longer has VOC emission limits for those emission units, and previous testing shows that the units, without the use of controls, are well under the applicable particulate matter limitations imposed by this permit. Therefore, these requirements have been removed from the permit.

### Enforcement Issue

There are no enforcement actions pending.

## Emission Calculations

See Appendix A of this document for detailed emission calculations.

## County Attainment Status

The source is located in DeKalb County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> 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 <sub>2.5</sub> .	

### (a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph Counties as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, and Shelby Counties as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (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. DeKalb 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) PM<sub>2.5</sub>

DeKalb County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions, and the effective date of these rules is July 15, 2008. Indiana has three (3) 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 PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions until 326 IAC 2-2 is revised.

### (c) Other Criteria Pollutants

DeKalb 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.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	0.26
PM <sub>10</sub>	1.05
SO <sub>2</sub>	0.08
VOC	366.14
CO	11.59
NO <sub>x</sub>	13.80

HAPs	tons/year
TDI/MDI*	9.50
<b>Total</b>	<b>9.76</b>

\*The worst case HAP is listed here.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of volatile organic compounds (VOC) is greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2006 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	27.12
PM <sub>10</sub>	21.45
SO <sub>2</sub>	0.01
VOC	18.66
CO	1.71
NO <sub>x</sub>	2.03
HAP (MDI)	0.35

**Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

**Potential to Emit After Issuance**

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

Process/ Emission Unit	Potential to Emit (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
VPF Line	-	-	-	168.72	-	-	0.52
Rebond Units	-	-	-	8.45	-	-	8.45
Sourcewide Adhesive Usage	-	-	-	3.59	-	-	0.00
Sourcewide Cleaning Solvent Usage	-	-	-	9.00	-	-	0.00
Boilers	0.26	1.05	0.08	0.76	11.59	13.80	0.26
<b>Total</b>	<b>0.26</b>	<b>1.05</b>	<b>0.08</b>	<b>190.53</b>	<b>11.59</b>	<b>13.80</b>	<b>9.23</b>
<b>Major Source Threshold</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>N/A</b>

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are not counted toward the determination of PSD applicability.

**Federal Rule Applicability**

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:
  - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;

- (2) is subject to an emission limitation or standard for that pollutant; and
- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

Units are exempt from the requirements of CAM if, pursuant to 40 CFR 64.2(b)(i), they are subject to the requirements of a NSPS or NESHAP standard promulgated after November 15, 1990. The VPF Line is controlled by a carbon adsorber system that reduces the VOC emissions from that unit to less than the major source threshold of 100 tons per year. However, the VPF Line is subject to the NESHAP for Flexible Polyurethane Foam Production (40 CFR 63, Subpart III) and this NESHAP was promulgated after November 15, 1990.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the existing units as part of this Part 70 permit renewal.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
  - (1) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, are not included in the permit for the three (3) natural gas-fired boilers. Construction of these units commenced prior to June 9, 1989, the applicability date of this rule.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Flexible Polyurethane Foam Fabrication Operations (40 CFR 63, Subpart M) are not included in the permit. The source uses non-HAP adhesives at the two (2) Baumer loop slitters. Pursuant to 40 CFR 63.8782, these units are therefore not subject to the requirements of Subpart M. Additionally, the other units used for the manufacturing and processing of flexible polyurethane foam are subject to the requirements of 40 CFR 63, Subpart III; pursuant to 40 CFR 63.8782(d)(1), the requirements of Subpart M are not applicable to those processes subject to Subpart III.
- (d) The requirements of the NESHAP for Flexible Polyurethane Foam Production and Fabrication Area Sources (40 CFR 63, Subpart O) are not included in the permit. Formulation changes at the source have decreased HAPs emissions to levels lower than major source thresholds, making the source an area source of HAPs. However, the source remains subject to the requirements of 40 CFR 63, Subpart III, until the EPA promulgates rulemaking that changes the "once in, always in" requirements for MACT standards.
- (e) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production (40 CFR Part 63, Subpart III), which is incorporated by reference as 326 IAC 20-22. The source was a major source of HAPs at the time of promulgation of this rule, thus becoming subject to the requirements of it. Since that time, the source has developed formulations that do not require the use of methylene chloride as a blowing agent, and has become an area source of HAPs. MACT standards are written as "once in, always in", and, as such, the source is still subject to the requirements of Subpart III. The units subject to this rule include the following:
  - (1) Four (4) rebond mold units, identified as EU-R1, EU-R2, EU-R3, and EU-R4, with a total maximum capacity of bonding 9.6 tons per hour of scrap foam. Each mold unit has an associated dryer (total of four (4) dryers). Each mold unit exhausts through one (1) separate stack. There are a total of eight (8) exhaust stacks

(28a, 28b, 29a, 29b, 35a, 35b, 36a, 36b) that serve each mold unit and each dryer.

- (2) One (1) source-wide adhesive application operation, with emissions venting inside the plant;
- (3) One (1) source-wide chemical cleaning solvent usage operation, with emissions venting inside the plant;
- (4) One (1) Variable Pressure Foaming (VPF) line, constructed in 2001 and modified in 2005, with a maximum production rate of 1.2 billion board feet of foam per twelve (12) consecutive month period, using carbon adsorbers as control, and exhausting to Stacks 39 and 40. The flexible foam is produced by the mix of TDI and/or MDI with polyol and/or resin and other chemicals, including amines, tins, silicones, and fillers; and

Insignificant Activity:

- (5) The following units emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:
  - (A) TDI/MDI Storage Tanks and TDI Doper Tank, all equipped with carbon drums; [40 CFR 63, Subpart III]

This source is subject to the following portions of Subpart III:

- (1) 40 CFR 63.1290;
- (2) 40 CFR 63.1291;
- (3) 40 CFR 63.1292;
- (4) 40 CFR 63.1293;
- (5) 40 CFR 63.1294;
- (6) 40 CFR 63.1299;
- (7) 40 CFR 63.1301;
- (8) 40 CFR 63.1302;
- (9) 40 CFR 63.1303;
- (10) 40 CFR 63.1304;
- (11) 40 CFR 63.1306;
- (12) 40 CFR 63.1307;
- (13) 40 CFR 63.1308; and
- (14) Table 2 to Subpart III.

The provisions of 40 CFR 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart III.

### State Rule Applicability

#### 326 IAC 1-5-2 (Emergency Reduction Plans)

The source is subject to 326 IAC 1-5-2. The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on February 1, 1999.

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

This source, which is not one (1) of the 28 listed source categories, is not subject to the requirements of this rule because the potential to emit of each regulated criteria pollutants is less than 250 tons per year.

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

The operation of the source will emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. The source is located in DeKalb County and does not have the potential to emit greater than the thresholds in 326 IAC 2-6-3(a)(1). Therefore, in accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2004 and every three (3) years after. The next emission statement for this source must be submitted by July 1, 2010. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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 the permit:

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

326 IAC 6-2 (Particulate Emissions Limitations for Source of Indirect Heating)

- (a) The two (2) boilers identified as Boilers #1 and #2 (EU-B1 and EU-B2) are subject to the requirements of 326 IAC 6-2-3, as they were constructed prior to September 21, 1983. Pursuant to 326 IAC 6-2-3(a), the particulate emissions from the two (2) boilers shall be limited by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where:

C = Maximum ground level concentration with respect to distance from the point source at the critical wind speed for level terrain. This shall equal 50 micrograms per cubic meter ( $\mu/m^3$ ) for a period not to exceed a sixty (60) minute time period.

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 mmBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 mmBtu/hr heat input.

$h$  = Stack height in feet.

Based on the equation above and information from the source, the calculated particulate limit is 1.03 lb/MMBtu. However, pursuant to 326 IAC 6-2-3(e), particulate emissions from the the two (2) boilers, Boilers #1 and #2, shall not exceed 0.6 lb/MMBtu. As demonstrated by the potential to emit calculations, the source is able to comply with this limit when burning natural gas.

- (b) The one (1) boiler identified as Boiler #3 (EU-B3) is subject to the requirements of 326 IAC 6-2-4, as it was constructed after the September 21, 1983 applicability date. Pursuant to 326 IAC 6-2-4(a), particulate emissions from the one (1) boiler shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

$Pt$  = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.

$Q$  = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input.

Based on the equation above, particulate emissions from the one (1) boiler identified as Boiler #3 shall not exceed 0.44 lb/MMBtu. As demonstrated by the potential to emit calculations, the source is able to comply with this limit when burning natural gas.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) Pursuant to 326 IAC 6-3-2, the particulate from the insignificant activities listed below shall not exceed 0.551 pounds per hour, each:

- (1) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment;
- (2) Bun cutters;
- (3) BSV slitters;
- (4) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone; and
- (5) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.

- (b) Pursuant to 326 IAC 6-3-2, the particulate emissions from the four (4) rebond mold units, identified as EU-R1, EU-R2, EU-R3, and EU-R4, with a total maximum capacity of

bonding 9.6 tons per hour of scrap foam, shall not exceed a total of 18.66 pounds per hour.

Based on the potential to emit calculations for these units, the source is able to comply with this limit.

The emissions rates for (a) and (b) above are calculated by the following:

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:

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

326 IAC 8-1-6 (Best Available Control Technology (BACT) for VOC)

Pursuant to Significant Source Modification 033-20970-00047, issued October 25, 2005, Significant Permit Modification 033-21341-00047, issued November 8, 2005, and 326 IAC 8-1-6 (BACT), the VOC BACT for the VPF Line shall be the following:

- (a) The Permittee shall operate the carbon adsorber to control total VOC emissions from the VPF line at all times that the VPF line is in operation.
- (b) The carbon adsorber shall operate at a minimum overall control efficiency of 51% for total VOC (including TDI, MDI, and tertiary amine VOC).
- (c) VOC emissions from the carbon adsorber shall not exceed 38.5 lbs/hr.
- (d) The production of polyurethane foam in the VPF line shall be limited to a maximum of 1.2 billion board feet per twelve (12) consecutive month period with compliance determined at the end of each month.

326 IAC 8-3-2 (Cold Cleaner Operation)

The one (1) parts washer with remote solvent reservoir is subject to the requirements of 326 IAC 8-3-2 because it was constructed after January 1, 1980. Therefore, pursuant to 326 IAC 8-3-2, the Permittee shall:

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

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The one (1) parts washer with remote solvent reservoir is not subject to the requirements of 326 IAC 8-3-5. Pursuant to 326 IAC 8-3-1(b)(1)(A), 326 IAC 8-3-5 is not applicable to cold cleaner degreasers with remote solvent reservoirs.

### 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The storage tanks at the source are not subject to the requirements of 326 IAC 8-9 because the source is not located in Clark, Floyd, Lake, or Porter County.

## Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance determination requirements applicable to this source are as follows:

(a) Testing Requirements

- (1) The Permittee shall perform VOC testing on the carbon adsorber controlling VOC emissions from the VPF line 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. The most recent valid test was performed on April 13, 2007. Testing shall be conducted in accordance with Section C - Performance Testing of the permit.

## Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on January 12, 2009. Additional information was received on April 15, 2009.

## Conclusion

The operation of this stationary flexible polyurethane foam production and foam processing plant shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No.033-27355-00047.

**Appendix A: Emissions Calculations  
Emissions Summary**

**Company Name:** Foamex, LP  
**Address City IN Zip:** 2211 South Wayne Street, Auburn, Indiana 46706  
**Permit Number:** T033-27355-00047  
**Reviewer:** Stephanie Wilkerson  
**Date:** 04/02/09

**Uncontrolled Emissions**

	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
VPF Line	-	-	-	344.33	-	-	1.05	(worst case)
Rebond Units	20.28	20.28	-	8.45	-	-	8.45	(worst case)
Fugitive VOC	-	-	-	12.59	-	-	-	
Boilers	0.26	1.05	0.08	0.76	11.59	13.80	0.26	(total)
Rebond Granulation	12.17	12.17	-	-	-	-	-	
<b>TOTAL</b>	<b>32.71</b>	<b>33.49</b>	<b>0.08</b>	<b>366.14</b>	<b>11.59</b>	<b>13.80</b>	<b>9.76</b>	

**Controlled Emissions**

	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
VPF Line	-	-	-	168.72	-	-	0.52	(worst case)
Rebond Units	20.28	20.28	-	8.45	-	-	8.45	(worst case)
Fugitive VOC	-	-	-	12.59	-	-	-	
Boilers	0.26	1.05	0.08	0.76	11.59	13.80	0.26	(total)
Rebond Granulation	3.65	3.65	-	-	-	-	-	
<b>TOTAL</b>	<b>24.19</b>	<b>24.98</b>	<b>0.08</b>	<b>190.53</b>	<b>11.59</b>	<b>13.80</b>	<b>9.23</b>	

**Appendix A: Emissions Calculations  
VOC and HAP Emissions  
From VPF Line without the Use of Blowing Agent**

**Company Name:** Foamex, LP  
**Address City IN Zip:** 2211 South Wayne Street, Auburn, Indiana 46706  
**Permit Number:** T033-27355-00047  
**Reviewer:** Stephanie Wilkerson  
**Date:** 04/02/09

**Potential To Emit before Control**

Material	Non-Reactive Fraction (%)	Weight % VOC (%)	Weight % HAP (%)	Max. Usage (lbs/min)	PTE of VOC (lbs/hr)	PTE of VOC (tons/yr)	PTE of HAP (tons/yr)
TDI 80/20*	0.0016%	100%	100%	250	0.24	1.05	1.05
MDI**	0.0011%	100%	100%	250	0.17	0.72	0.72
Amine (Catalyst)	27.5%	100%	0.00%	4.75	78.4	343	0.00
<b>Total (worst case)</b>					<b>78.6</b>	<b>344</b>	<b>1.05</b>

\* TDI = 2, 4 -Toluene Diisocyanate.

\*\* MDI = 4,4' Methylene Diphenyl Dissocyanate.

**Potential To Emit after Control**

Material	Overall Control Efficiency* (%)	Controlled PTE of VOC (lbs/hr)	Controlled PTE of VOC (tons/yr)	Controlled PTE of HAP (tons/yr)
<b>Total</b>	<b>51.0%</b>	<b>38.5</b>	<b>169</b>	<b>0.52</b>

\* This unit is controlled by a carbon adsorber. The efficiency information is provided by the source and will be verified by stack tests.

**METHODOLOGY**

PTE of VOC before Control (lbs/hr) = Max. Usage (lbs/min) x 60 min/hr x Non-Reactive Fraction (%) x Weight % VOC

PTE of VOC/HAP before Control (tons/year) = PTE of VOC/HAP (lbs/hr) x 8760 hours/year x 1 ton/2000 lbs.

Controlled PTE of VOC (lbs/hr) = PTE of VOC before Control (lbs/hr) x (1-Overall Control Efficiency)

Controlled PTE of VOC/HAP (tons/yr) = PTE of VOC/HAP before Control (tons/yr) x (1-Overall Control Efficiency)

**Appendix A: Emissions Calculations  
VOC and HAP Emissions  
Rebond Mold Units**

**Company Name:** Foamex, LP  
**Address City IN Zip:** 2211 South Wayne Street, Auburn, Indiana 46706  
**Permit Number:** T033-27355-00047  
**Reviewer:** Stephanie Wilkerson  
**Date:** 04/02/09

	VHAP Emission Factor (lb/hr) <sup>1</sup>	Potential VHAP pounds per hour	Potential VHAP pounds per day	Potential VHAP tons per year
TDI/MDI	1.9	1.93	46.32	8.45

**Potential Emissions**

**46.32**

**8.45**

<sup>1</sup> Emission factors from stack testing completed January 2002

**METHODOLOGY**

Potential VHAP Pounds per Day = Pounds of VHAP per hr \* (24 hr/day)

Potential VHAP Tons per Year = Pounds of VHAP per hr \* (8760 hr/yr) \* (1 ton/2000 lbs)

**Appendix A: Emissions Calculations**  
**Particulate Matter Emissions**  
**Rebond Mold Units**

**Company Name:** Foamex, LP  
**Address City IN Zip:** 2211 South Wayne Street, Auburn, Indiana 46706  
**Permit Number:** T033-27355-00047  
**Reviewer:** Stephanie Wilkerson  
**Date:** 05/13/09

<b>Rebond Mold Unit</b>	<b>Number of Units</b>	<b>PM Emission Factor* (lb/hr)</b>	<b>PM/PM<sub>10</sub> Emissions (lb/hr)</b>	<b>PM/PM<sub>10</sub> Emissions (tons/yr)</b>
Flat Block	1	0.28	0.28	1.23
Round Block (Main stack + dryer)	3	1.45	4.35	19.05
<b>Total Potential Emissions</b>			<b>4.63</b>	<b>20.28</b>

\* - Emission factors from January 2002 stack testing of the rebond mold units.

**METHODOLOGY**

PM/PM<sub>10</sub> Emissions (lb/hr) = Emission Factor \* Number of Units

PM/PM<sub>10</sub> Emissions (tons/yr) = Emissions (lb/hr) \* 8760 hr/yr \* 1/2000 lbs/ton

**Appendix A: Emissions Calculations  
Fugitive VOC Emissions**

**Company Name: Foamex, LP**  
**Address City IN Zip: 2211 South Wayne Street, Auburn, Indiana 46706**  
**Permit Number: T033-27355-00047**  
**Reviewer: Stephanie Wilkerson**  
**Date: 04/02/09**

	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Maximum Usage (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
Sourcewide cleaning solvent usage	8.9	100.00%	0.0%	100.0%	0.0%	0.23000	8.93	8.93	2.05	49.29	9.00
Sourcewide adhesive application <sup>1</sup>	10.3	72.52%	0.0%	72.5%	0.0%	0.11000	7.47	7.47	0.82	19.72	3.60

**Potential Emissions** **69.01**      **12.59**

<sup>1</sup> Transfer efficiency is 100%, so no particulate emissions are expected

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Maximum usage (gal/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Maximum Usage (gal/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Maximum Usage (gal/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

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

**Company Name:** Foamex, LP  
**Address City IN Zip:** 2211 South Wayne Street, Auburn, Indiana 46706  
**Permit Number:** T033-27355-00047  
**Reviewer:** Stephanie Wilkerson  
**Date:** 04/02/09

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

31.5

275.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.3	1.0	0.1	13.8	0.8	11.6

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See next page for HAPs emissions calculations.

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

**Company Name: Foamex, LP  
 Address City IN Zip: 2211 South Wayne Street, Auburn, Indiana 46706  
 Permit Number: T033-27355-00047  
 Reviewer: Stephanie Wilkerson  
 Date: 04/02/09**

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.897E-04	1.656E-04	1.035E-02	2.483E-01	4.691E-04

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	6.899E-05	1.518E-04	1.932E-04	5.243E-05	2.897E-04

Methodology is the same as the previous page.

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

**Appendix A: Emission Calculations****PM/PM10 Emissions  
Rebond Granulation Process**

**Company Name:** Foamex, L.P.  
**Address City IN Zip:** 2211 South Wayne Street, Auburn, Indiana 4  
**Permit:** T033-27355-00047  
**Reviewer:** Stephanie Wilkerson  
**Date:** April 28, 2009

**1. Process Description:**

PM Control Equipment: Cyclone and Baghouse in series  
Amount of foam dust collected from baghouse: 2.75 pounds  
Time period of collection: 1 hour  
Control efficiency - Cyclone: 70.00%  
Control efficiency - Baghouse: 99%

**2. Amount collected (lb/hr):** 2.75

**3. Uncontrolled PM/PM10 Emissions:**

= (Amount collected (lbs/hr)) / (control efficiency of the baghouse) = **2.78 lbs/hr**  
= (Uncontrolled emissions (lbs/hr)) \* 8760 hr/yr \* (1/2000 lbs/ton) = **12.167 tons/yr**

**4. Controlled PM/PM10 Emissions:**

= (Uncontrolled emissions (lbs/hr)) \* (1 - control efficiency of the cyclone) = **0.83 lbs/hr**  
= (Controlled emissions (lbs/hr)) \* 8760 hr/yr \* (1/2000 lbs/ton) = **3.650 tons/yr**



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

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

## SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

**TO:** Catherine Mowery  
Foamex Innovations, Inc.  
2211 S. Wayne St.  
Auburn IN 46706

**DATE:** July 31, 2009

**FROM:** Matt Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

**SUBJECT:** Final Decision  
Title V Renewal  
033-27355-00047

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:  
Gary Reynolds Plant Mgr. Foamex Innovations, Inc.  
James Dicola Malcolm Pirnie, Inc.  
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at [jbrush@idem.IN.gov](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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July 31, 2009

TO: Eckhart Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

**Applicant Name: Foamex Innovations, Inc.**  
**Permit Number: 033-27355-00047**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

IDEM Staff	BLOCCHET 7/31/2009 Foamex Innovations, Inc. 033-27355-00047 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Catherine Mowery Foamex Innovations, Inc. 2211 S Wayne St Auburn IN 46706 (Source CAATS) <i>Via Confirmed Delivery</i>										
2		Gary Reynolds Plant Manager Foamex Innovations, Inc. 2211 S Wayne St Auburn IN 46706 (RO CAATS)										
3		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)										
4		DeKalb County Commissioners 100 South Main Street Auburn IN 46706 (Local Official)										
5		Ms. Diane Leroy 303 N. Jackson St. Auburn IN 46706 (Affected Party)										
6		Mr. Janel Rogers 311 S. Main Auburn IN 46706 (Affected Party)										
7		Mr. Barry Fordanish R#3 1480 CR 66 Auburn IN 46706 (Affected Party)										
8		Mr. Dave Weilbaker 1423 Urban Ave Auburn IN 46706 (Affected Party)										
9		Mr. Brent Beaty 1607 Allison Auburn IN 46706 (Affected Party)										
10		Auburn City Council and Mayors Office P.O. Box 506 Auburn IN 46706-0506 (Local Official)										
11		Dekalb County Health Department 215 E. 9th, County Office Building, Suite 201 Auburn IN 46706-2336 (Health Department)										
12		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
13		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)										
14		21Alive P.O. Box 2121 Fort Wayne IN 46801 (Affected Party)										
15		NBC33 2633 West State Blvd Fort Wayne IN 46808 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Brown & Sons Fuel Co. P.O. Box 665 Kendallville IN 46755 (Affected Party)									
2		Niann Lautzenhiser 660 LN 210 Hamilton LK Hamilton IN 46742 (Affected Party)									
3		Cheryl C. Buehring RTP Environmental Associates, Inc. 1900 South Highway 14, Suite 4-B Greer SC 29650 (Consultant)									
4		Mr. Marty K. McCurdy 2550 County Road 27 Waterloo IN 46793 (Affected Party)									
5		James DiCola Malcolm Pirnie, Inc 1515 Woodfield Road, Ste 360 Schaumburg IL 60173 (Consultant)									
6		Eckhart Public Library 603 South Jackson Street Auburn IN 46706 (Library)									
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Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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